

3c

RCRA INSPECTION FORM

Report Prepared for:

T. Moy

Generator

☐

Transporter

☐

HWM (TSD) FACILITY

☒

Copy of Report Sent to the Facility

☐

FACILITY INFORMATION

NAME:

Proteco

LOCAL ADDRESS:

Peñuelas, P.R.

Zip Code 08724

POSTAL ADDRESS:

Firm Delivery
Ponce, P.R.

Zip Code 08231

E.P.A. ID #:

PRD091018622

DATE OF INSPECTION:

1/23 - 24/89

Participating Personnel

E.Q.B. or E.P.A. Personnel:

Priscilla Britard, EQR

Tom H. Moy, EPA

Peggy McGrath,

Al Hernandez, EPA

Facility Personnel:

Norbert Bolda, General Manager

Rene R. Rodriguez, Compliance Manager

Report Prepared by: (Name)

Tom H. Moy

Agency:

EPA

Telephone Number:

(212) 264-1285

Approved for the Director by:

[Signature]

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

Proteccion Tecnica Ecologica (Proteco), Inc.
formerly known as Desarrollo Ambiental, Inc.
operates the facility located on the Southern
Coast of P.R. near the City of Ponce. The operating
company Proteco is owned by Rolando Marrero V. Inc.
The activities conducted at the Proteco Residues waste
(H.W.) management facility include the receipt, storage and
disposal of H.W. and the receipt and disposal of non-
H.W. The H.W. received and accepted at the facility
are generated from many diverse manufacturing
operations located in P.R.
As a result of the CA/CD between EPA and Proteco
and the Surface Impoundment retrofitting
requirement of RCRA Section 3005 (f)(1), the
containment storage area is the only remaining
interim status H.W. unit.

Describe the activities that result in the generation of hazardous waste.

Identify the hazardous waste located on site, and estimate the approximate quantity of each. (Identify Waste Codes)

- There were approximately 734 drums located in the Container Storage area for various generators.
- One Trailer of 7006 Contaminated soil for Digital weight approx 20 ton received date 11/30/88 Manifest # 88266

Is there reason to believe that the facility has hazardous waste on-site?

- a. If yes, what leads you to believe it is hazardous waste?
Check appropriate boxes.

- ☒ Company admits that its waste is hazardous during the inspection.
- ☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- ☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31).
- ☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32).
- ☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33).
- ☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report).
- ☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A - General

See TSD Checklist

262.11

Hazardous waste determination

(a) Did the generator test its waste to determine whether it is hazardous?

YES

NO

N/A

_____✓

Is the waste hazardous?

Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?

40 CFR Subpart B - The Manifest

262.20

Has hazardous waste been shipped off site since November 19, 1980?

_____✓

If yes, how many shipments, off site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.

Does the generator have an EPA ID #?

_____✓

Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient)

The generator's name, address and phone number?

The generator's EPA ID number?

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
The transporter(s) name, address, and phone number?	—	—	—
The transporter(s) EPA ID number?	—	—	—
The name, address and phone number of the designated TSD facility?	—	—	—
The TSDF's EPA ID number?	—	—	—
The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	—	—	—
Special handling instructions and any other information required on the form to be shipped by the generator?	—	—	—
Before allowing the manifested waste to leave the generator's property, did the generator:			
Sign the manifest certification by hand?	—	—	—
Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	—	—	—
Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	—	—	—
Give remaining copies of the manifest form to the transporter?	—	—	—
Has the generator maintained facility records for three (3) years (Manifest)s, exception report(s) and waste analysis)	—	—	—

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	—	—	—
If not:			
1. Did the generator contact the hauler and/or the owner or operator of the TSD and the EQB to inform the EQB of the situation, and	—	—	—
2. Have exception reports been submitted to the EQB covering any of these shipments made more than 45 days ago?	—	—	—
Before transporting or offering hazardous waste for transportation off site, does the generator?	—	—	—
Conspicuously label appropriate manifest numbers on all hazardous waste containers that are intended for shipment?	—	—	—
Insure that all containers used to transport hazardous waste off site are in conformance with applicable DOT regulations (i.e., 49 CFR 171 - 49 CFR 179)?	—	—	—

Accumulation Time

How is waste accumulated on site?

- ☐ Containers
- ☐ Tanks (complete HWMF checklist)
 - ☐ Aboveground ☐ Below ground
- ☐ Surface impoundments (complete HWMF checklist)
- ☐ Piles (complete HWMF checklist)

Is each container clearly dated with
each period of accumulation so as to
be visible for inspection?

YES NO N/A

Is waste accumulated for more than
90 days?

If yes, complete HWMF checklist.

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSD) CHECKLIST IS
FILLED OUT.

SHORT TERM ACCUMULATION STANDARDS (FOR GENERATORS WHO ACCUMULATE WASTE IN CONTAINERS FOR 90 DAYS OR LESS)

YES NO N/A

40 CFR 265 - Subpart I

265.170

Containers

What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty five gallon drums of waste acetone).

Do the containers appear to be in good condition, not in danger of leaking?

If no, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

Are all containers securely closed except those in use?

Do containers appear to be properly handled or stored in a manner which will minimize the risk of the container rupturing or leaking?

Are containerized hazardous waste segregated in storage by waste type?

Is every container arranged so that its identification label is visible?

Is the storage area inspected at least weekly?

Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) from the facility's property line?

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
	<u>40 CFR 265 Subpart J</u>			
265.190	<u>Tanks</u>			
	Does the generator store hazardous waste in tanks?	—	—	—
	If yes, what are the approximate number and size of tanks containing hazardous waste?			
	Identify the waste treated/stored in each tank.			
265.192	<u>General Operating Requirements</u>			
	Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?	—	—	—
	If no, please explain.			
	Are there leaking tanks?	—	—	—
	Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	—	—	—
	Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?			
	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?	—	—	—

265.194

Inspections

Is the tank(s) inspected each operating day for:

1. Discharge control equipment
2. Monitoring equipment
3. Level of waste in tank
4. Construction of materials of the tank
5. Are there tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

Are there underground tanks used to store hazardous waste?

If yes, how many and can they be entered for inspection?

Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

If no, please explain.

Does it appear that incompatible wastes are being stored separate from each other?

265.16

Personnel training

Have facility personnel successfully completed a program of classroom instruction or on-the-job training since six months after the date of their employment or assignment to the facility or to a new position at the facility?

YES NO N/A

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?	—	—	—
If yes, have facility personnel taken part in an annual review of the initial training?	—	—	—
Is there written documentation of the following:			
Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	—	—	—
A written job description for each position related to hazardous waste management?	—	—	—
A written description of the type and amount of both introductory and continuing training that has been and will be given to personnel in jobs related to hazardous waste management?	—	—	—
Documentation of actual training or experience received by personnel?	—	—	—
Are training records kept on all current employees until closure of the facility and training records kept on former employees for three years from their last date of employment?	—	—	—

265.32

40 CFR 265 - Subpart C

Preparedness and prevention

Does the facility comply with preparedness and prevention requirements including maintaining:

An internal communications or alarm system?

A telephone or other device to summon emergency assistance from local authorities?

Portable fire equipment, spill control equipment, and decontamination equipment?

Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?

Is equipment tested and maintained?

Is there immediate access to communications or alarm systems during handling of hazardous waste?

Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?

If no, please explain.

In your opinion, do the types of waste on site require all of the above procedures, or are some not required?

Explain.

YES NO N/A

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Has the facility made the following arrangements, as appropriate for the type of waste handled on site?	—	—	—
Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	—	—	—
Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	—	—	—
Agreements with emergency response contractors, and equipment suppliers?	—	—	—
Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	—	—	—

40 CFR Subpart D

265.50

Contingency plan and emergency procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?

— — —

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	—	—	—
Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	—	—	—
Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or Part 1510?	—	—	—
If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?	—	—	—
Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	—	—	—
Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up to date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall be listed in the order in which they will assume responsibility as alternates.	—	—	—

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?	_____	_____	_____
Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?	_____	_____	_____
Is a copy of the contingency plan and all revisions to the plan:			
1. Maintained at the facility; and			
2. Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?	_____	_____	_____

-12A-

TRANSPORTER INSPECTION

40 CFR Part 263 - Transporter Standards

263.10

Does the transporter carry hazardous waste?
If yes, explain.

YES

NO

N/A

—

—

—

Does the transporter store hazardous waste
at a transfer facility - if yes, how long?

—

—

—

— 10 days or less

— more than 10 days (complete TSD form)

Has the transporter obtained a
hazardous waste collector/hauler
license from the EQB?
License #:

—

—

—

Does the transporter have an EPA
identification number?

—

—

—

Does the transporter have in each
registered vehicle a current list
of all federal and state agencies
to be notified in the event of a
discharge of hazardous waste during
transportation?

—

—

—

How many vehicles were inspected?

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Have the drivers received any instruction or training to do with the handling of hazardous waste?	—	—	—
Has the transporter ever had an unauthorized discharge of hazardous waste during transportation?	—	—	—
If yes, did the transporter:			
Give notice, if required by 49 CFR 171.15 to the National Response Center?	—	—	—
Report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials, Transportation Bureau, Department of Transportation, Washington, DC 20590?	—	—	—

263.20

MANIFESTS

YES NO N/A

Does the transporter have a manifest form to accompany the waste shipment?

Does a representative portion of the manifests show the following information (if not, circle the missing information).

• Generator's name, address, telephone, and EPA ID number, signature and date of signature.

• Transporter's name, EPA ID number, signature and date of signature.

• TSDF's name, address and EPA ID number

and either the signature and date of the TSDF or the name, EPA ID, signature and date of the next transporter.

• Manifest Document Number

• Proper DOT shipping description

• Quantity and type of containers

(If no, to any of the above obtain copies of incomplete manifests).

Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain.

Has the transporter maintained facility records for three (3) years?

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
If the shipment originated from a site in Puerto Rico and is destined for another site in Puerto Rico, is the manifest form one supplied by the EQB?	—	—	—
If the shipment originated from a site in Puerto Rico and is destined for a TSDF in another state, is the manifest form one supplied by EQB or one approved for use by the Department?	—	—	—
If the hauler was unable to deliver a manifested load to the designated facility, did they contact the generator and gain further instructions from them?	—	—	—
If yes, cite generator name and manifest number involved.			

HAZARDOUS WASTE FACILITY STANDARDS

40 CFR Part 265 Subpart B - General Facility Standards

265.13

Waste Analysis

YES

NO

N/A

Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis must contain all the information necessary for proper treatment, storage or disposal of the waste).

—

✓

—

Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?

✓

—

—

Check only one:

Waste characteristics vary

—

All waste(s) are basically the same

—

Company treats all waste(s) as hazardous

—

Is there a written waste analysis plan at the facility?

✓

—

—

Does it contain:

Parameters for which each hazardous waste stream will be analyzed and the rationale for the selection of these parameters?

✓

—

—

The test methods which will be used to test for these parameters?

✓

—

—

The sampling method which will be used to obtain a representative sample of the waste to be analyzed?

✓

—

—

* The only testing parameters performed by Protec are high incineration load and pH, flammability, viscosity, water content, cyanide & sulfide.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Procedures which will be used to identify changes in waste stream characteristics?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the owner or operator submit the waste analysis plan to the department?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, when was the plan submitted?			
Does hazardous waste come to this facility from an outside source (e.g., another generator)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, list the name(s) of generators.			
<i>See Attachment (Exhibit) #14</i>			
If waste comes from an outside source, are there procedures in the waste analysis plan to insure that waste received conforms to the accompanying manifest?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the plan describe:			
The procedures which will be used to determine the identity of each shipment of waste managed at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

265.14

Security

YES NO N/A

Does the facility have:

A 24 hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?

☒ ☐ ☐

An artificial or natural barrier, which completely surrounds the active portion of the facility; and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility?

☒ ☐ ☐

Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?

☒ ☐ ☐

If no, explain what measures are taken for security.

265.15

General Inspection Requirements

Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:

Discharge of hazardous waste constituents to the environment?

A threat to human health?

Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention, detection or response to the environmental or human health?

Is the written inspection schedule kept at the facility?

Does the schedule identify the types of problems to be looked for during the inspection?

Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the probability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?

Is there evidence that problems reported in the inspection log have been remedied?

Does the owner/operator record inspections in a log?

Are these records kept for at least three (3) years from the date of inspection?

YES NO N/A

✓
✓

✓

✓

✓

✓

✓

✓

✓

YES NO N/A

Does the records include the date, and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action?

☒ ☐ ☐

265.16

Personnel training

Have facility personnel successfully completed a program of classroom instruction or on-the-job training within six (6) months of having been employed?

☒ ☐ ☐

Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed?

Mr. Rene R. Rodriguez, Comp. Manager, accepted the position on 10/18/87. He has no past experience in RCRA related work. During the interview Mr. Rodriguez indicated that he will be attending a course in March or April of this year at DOT Reg. and RCRA related courses.

If yes, have facility personnel taken part in an annual review of training?

Is there written documentation of the following:

Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?

☒ ☐ ☐

A written job description for each position related to hazardous waste management?

☒ ☐ ☐

A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?

☒ ☐ ☐

Documentation of actual training or experience received by personnel?

☐ ☒ ☐

No documentation of actual training on Mr. Rodriguez.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are training records kept on all current employees until closure of the facility and training records kept on former employees for 3 years from their last date of employment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>Preparedness and prevention</u>			
Does the facility comply with preparedness and prevention requirements including maintaining:			
An internal communications or alarm system?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A telephone or other device to summon emergency assistance from local authorities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Portable fire equipment, spill control equipment, and decontamination equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is equipment tested and maintained?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is there immediate access to communications or alarm systems during handling of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adequate aisle space to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If no, please explain.			

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
In your opinion, do the types of waste on site require all of the above procedures, or are some not required?	<u>✓</u>	<u> </u>	<u> </u>

Explain.

Has the facility made the following arrangements, as appropriate for the type of waste handled on site?

Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	<u>✓</u>	<u> </u>	<u> </u>
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Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	<u> </u>	<u> </u>	<u>✓</u>
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Agreements with emergency response contractors, and equipment suppliers?	<u>✓</u>	<u> </u>	<u> </u>
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Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	<u>✓</u>	<u> </u>	<u> </u>
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	<u>YES</u>	<u>NO</u>	<u>N/A</u>
265.50 <u>Contingency plan and emergency procedures</u>			
Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or Part 1510?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Does the plan list names, addresses, and phone number (office and home) of all persons qualified to act as emergency coordinator and is this list kept up-to-date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall assume responsibility as alternates.

YES NO N/A

*Require update
to include the new
Emergency Coordinator*

Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?

✓

Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires)?

✓

Is a copy of the contingency plan and all revisions to the plan:

1. Maintained at the facility; and
2. Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?

✓
✓

265.112

Closure plan

Does the facility have a written closure plan?

YES NO N/A

✓ — —

Does the owner/operator keep a written copy of the closure plan and all revisions to the plan at the facility?

✓ — —

If yes, does the plan include:

A description of how and when the facility will be partially closed (if applicable) and ultimately closed?

Closure Plan for each of the regulated units is under review

— — —

The maximum extent of the operation which will be unclosed during the life of the facility?

— — —

An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility?

— — —

A description of the steps needed to decontaminate facility equipment during closure?

— — —

A schedule for final closure including the anticipated date when the wastes will no longer be received, the date when completion of final closure is anticipated, and intervening milestone dates which will allow tracking of the progress of closure?

— — —

265.118

Post Closure Plan

Does the facility have a written post-closure plan kept at the facility?

✓ — —

Post-Closure Plan is also under review

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
If yes, does the plan:			
Identify the activities which will be carried on after closure and the frequency of these activities?	—	—	—
Include a description of the planned groundwater monitoring activities and frequencies at which they will be performed?	—	—	—
Include a description of the planned maintenance activities, and frequency at which they will be performed, to insure the following:			
The integrity of the cap and final cover or other containment structures where applicable?	—	—	—
Describe the function of the facility monitoring equipment?	—	—	—
Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period?	—	—	—
Does the owner/operator have a written estimate of the cost of post-closure for the facility?	—	—	—

If yes, what is it?

Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

Storage

Treatments

Disposal

Container - pg. 5

Tank - pg. 30

Landfill - pg. 39

Tank, above ground - pg. 6

Surface Impoundments - pg. 35

Surface Impoundments - pg. 35

Tank, below ground - pg. 6

Incineration - pg. 42

Other _____

Surface Impoundments - pg. 35 Thermal Treatment - pg. 45

Waste Piles - pg. 37

Chemical, Physical and Biological Treatment - pg. 45

Other _____

Other _____

YES NO N/A

40 CFR 265 Subpart 1

Containers

What type of containers are used for storage? Describe the size, type, quantity and nature of wastes (e.g., 12 fifty-five gallon drums of waste acetone).

They were approx. 734 drums (55 gal each) stored at the storage area. A further weight approx 200 tons of contaminated soil with 7006 located at the center of the storage area.

Is there a containment system for spills, leaks and precipitation?

☒ ☐ ☐

If yes, describe the containment system.

There are approx. 10,000 sqm of area available for drum storage. The floor of the containment area is compacted soil.

Do the containers appear to be of sturdy leakproof construction of adequate wall thickness, weld, hinge and seam strength, and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the container's ability to contain hazardous waste?

☒ ☐ ☐

If no, explain.

YES NO N/A

Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste?

✓

If no, explain.

Do the containers appear to be in good condition, not in danger of leaking?

✓

If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.

Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors?

✓

If no, explain.

Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?

✓

If no, explain.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are containerized hazardous wastes segregated in storage by waste type?	—	✓	—
Are containerized hazardous wastes arranged so that their identification label is visible?	✓	—	—
Are hazardous wastes stored in containers made of compatible materials?	✓	—	—
Does the owner/operator inspect the container storage area at least weekly, looking for leaks and for deterioration caused by corrosion or other factors?	✓	—	—
Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	✓	—	—
Are incompatible wastes, or incompatible wastes and materials placed in the same container?	—	✓	—
If yes, explain.			

Are hazardous wastes placed in unwashed containers that previously held incompatible wastes?

— — — ✓

If yes, explain.

* One drum of oxidizing material was found in a storage bay containing 7001 and 7002 waste. There was no dike or berm to segregate the drums in the event of a leak. As per 40CFR Part 265, Appendix II - Examples of Potentially Incompatible Waste, strong oxidizing materials be segregated from solvents. This practice or procedure of storage of incompatible waste is unacceptable management procedure and, therefore, is a violation of 40CFR 265.177. The drum was generated from Saint John School, 1454-66 Asford Ave, dated 9/7/86 and was labeled D002 and stated oxidizing material.

YES NO N/A

Are containers holding hazardous waste that are incompatible with any waste or other materials stored nearby in other containers, open tanks, or surface impoundments separated from other materials or protected from them by means of a dike, berm, wall or other device?

See notes page 28.
*

— ✓ —

Are ignitable, reactive or incompatible wastes protected from sources of ignition or reaction?

— ✓ —

If no, explain.

See notes on page 28

Does the owner/operator confine smoking and open flames to specially designated locations when ignitable or reactive wastes are being handled?

✓ — —

If no, explain.

Does the owner/operator conspicuously place "No Smoking" signs whenever there is a hazard from ignitable or reactive waste?

✓ — —

If the treatment, storage or disposal of ignitable or reactive waste, and the mixture of incompatible wastes and materials, conducted so that it does not:

Generate extreme heat or pressure, fire or explosion, or violent reaction?

— ✓ —

Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?

YES NO N/A

— ✓ —

Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?

— ✓ —

Damage the structural integrity of the device or facility containing the waste?

— ✓ —

Threaten human health or the environment?

— ✓ —

40 CFR 265 Subpart J

Tanks

What are the approximate number and size of tanks containing hazardous wastes?

One (7,000 gal) ^{empty} tank formerly used for storage of lindane.

Identify the waste treated/stored in each tank.

Lindane

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
<u>General Operating Requirements</u>			
Are hazardous wastes or treatment reagents placed in the tank that could cause the tank or its inner liner to rupture, leak or corrode?	—	—	✓
If yes, please explain.			
Are there leaking tanks?	—	✓	—
Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?	—	—	✓
Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	—	—	✓
If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank, e.g., bypass system to a standby tank?	—	—	✓

Inspections

Is the tank(s) inspected for:

1. Discharge control equipment (each operating day)	✓	—	—
2. Monitoring equipment (each operating day)	✓	—	—
3. Level of waste in tank (each operating day)	✓	—	—
4. Construction of materials of the tank (weekly)	✓	—	—

Are there underground tanks used to store hazardous wastes?

If yes, how many and can they be entered for inspection?

Has the underground tank been in use on or before November 19, 1980? Specify date.

If no, when was the tank placed in use?

Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

If no, please explain.

Does it appear that incompatible wastes are being stored separate from each other?

YES NO N/A

YES

NO

N/A

40 CFR 265.90 Subpart F

265.90

Groundwater monitoring

(Applies only to: surface impoundments, landfills, land disposal facilities)

Does the owner/operator have a groundwater monitoring plan capable of determining the facility's impact on the quality of groundwater?

If no, please explain.

How many monitoring wells has the facility installed?

What is the depth to groundwater?

How many deep monitoring wells are on-site? (Indicate depth of monitoring wells)

How many shallow monitoring wells are on-site? (Indicate depth of monitoring wells)

*Subpart F
requirements are
under review*

— — —

Is the groundwater monitoring system capable of yielding groundwater samples for analysis?

YES NO N/A

If no, please explain.

Are monitoring wells installed hydraulically upgradient?

If yes, specify how many and the depth of each.

How many monitoring wells are installed hydraulically down gradient?

If yes, specify how many and the depth of each.

Does the owner/operator have a groundwater sampling and analysis plan?

If no, please explain.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Does the plan include procedures and techniques for:			
1. Sample collection	—	—	—
2. Sample preservation and shipment	—	—	—
3. Analytical procedures	—	—	—
4. Chain of custody	—	—	—

40 CFR Subpart K

265.220

Surface Impoundments

Describe the design and operating features of the surface impoundment to prevent groundwater contamination (e.g., liner leachate collection system).

- *two neutralization impoundment (loss their permit status since 11/8/85)*
- *rainwater basin at oil lagoon (subject to closure pursuant to the retrofitting requirement)*

Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of waste stored and treated.

*There are four S.I.s at Portico. They are as follows:
One of the neutralization lagoons (former lagoon) was closed in place in '86.*

Is there at least two feet of freeboard in the impoundment?

— — —

Do all earthen dikes have a protective cover to preserve their structural integrity?

— ✓ —

If yes, please specify the type of covering.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the owner or operator inspect: The freeboard level at least once each operating day to insure compliance with 265.222?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is ignitable or reactive waste placed in the surface impoundment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If yes, is the waste treated, rendered, or mixed before or immediately after placement in the impoundment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is the waste treated, rendered or mixed so that it does not: Generate extreme heat or pressure, fire or explosion, or violent reaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Damage the structural integrity of the device or facility containing the waste?	—	—	—
Threaten human health or the environment?	—	—	—
Is the surface impoundment used solely for emergencies?	—	—	—
Are incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment?	—	—	—
If yes, is the waste managed so that it does not:			
Generate extreme heat or pressure, fire or explosion, or violent reaction?	—	—	—
Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	—	—	—
Damage the structural integrity of the device or facility containing the waste?	—	—	—
Threaten human health or the environment?	—	—	—

Sampling data indicated there is a release from the oil lagoon into the air.

40 CFR Subpart L

265.250

Waste Piles

How many waste piles are on-site and approximately how large are they? (Please indicate size and height types of wastes in piles.)

Is the waste pile protected from wind erosion?

a) Does it appear to need such protection?

b) Explain what type of protection does exist.

—	—	—
—	—	—

		<u>YES</u>	<u>NO</u>	<u>N/A</u>
265.253	<u>Containment</u>			
	1. Is leachate run-off from the waste piles a hazardous waste? If no, skip down to 265.256.	—	—	—
	2. Is the pile placed on an impermeable base?	—	—	—
	3. Is run-on diverted away from the pile?	—	—	—
	4. Is the leachate and run-off collected and treated?	—	—	—
	If no to any of the above questions than:			
	5. Is the pile protected from precipitation and run-on?	—	—	—
	6. Are waste containing free liquids placed in the pile?	—	—	—
265.256	1. Are ignitable or reactive wastes placed on the pile? If no, skip to 265.257.	—	—	—
	2. Is the ignitable or reactive waste added to existing pile resulting in it no longer meeting the definition of ignitable and reactive?	—	—	—
	If no, please explain.			
	3. Is the waste protected from any materials or condition that may cause it to ignite or react?	—	—	—
	If no, please explain.			

265.257

Does it appear that a pile of incompatible wastes is being stored separate from other wastes or materials, or protected from them by means of a dike, berm, wall or other devices?

YES NO N/A

If no, please explain.

— — —

265.300

40 CFR 265 Subpart N

Landfills

Identify the types of waste and size of the landfill.

*Closure plan
under review*

General Operating Requirements

Is run-on diverted away from all portions of the landfill?

Is run-off from active portions of the landfill collected?

Is waste which is subject to wind dispersal controlled?

Please explain how.

— — —
— — —
— — —

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are untreated, ignitable, or reactive wastes placed in the landfill?	_____	_____	_____
If yes, explain.			
Are incompatible wastes, or incompatible wastes and materials placed in the same hazardous waste landfill cell?	_____	_____	_____
If yes, explain.			
Are bulk or non-containerized liquid waste or waste containing free liquids placed in a hazardous waste landfill?	_____	_____	_____
If yes:			
Does the hazardous waste landfill have a liner which is chemically and physically resistant to the added liquid and a functioning leachate collection and removal system with a capacity sufficient to remove all leachate produced?	_____	_____	_____
Before disposal, is the liquid waste or waste containing free liquids treated or stabilized, chemically or physically, so that free liquids are no longer present?	_____	_____	_____
Are containers holding liquid waste or waste containing free liquids placed in a hazardous waste landfill?	_____	_____	_____
If yes:			
Is the container designed to hold liquids or free liquids for a use other than storage, such as a battery?	_____	_____	_____

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Is the container very small, such as an ampule?	—	—	—
Are empty containers crushed flat, shredded, or similarly reduced in volume before it is buried beneath the surface of a hazardous waste landfill?	—	—	—
Does the owner or operator use Method 9095 (Paint Filter Liquids Test) to demonstrate the absence or presence of free liquids in either a containerized or a bulk waste?	—	—	—
Does the owner or operator of a hazardous waste landfill maintain an operating record required in 265.73?	—	—	—
Does the owner/operator maintain a map, the exact location and dimensions, including depth of each cell with respect to permanently surveyed bench marks?	—	—	—
The contents of each cell and the appropriate location of each hazardous waste type within each cell?	—	—	—
Are containers holding liquid waste or waste containing free liquids place in the landfill?	—	—	—
Please describe the types and contents of such containers placed in the landfill.			
Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried?	—	—	—

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Are small containers of hazardous waste in overpacked drums placed in the landfill?	—	—	—
If yes, please describe precautions taken to prevent the release of the waste.			

40 CFR 265 Subpart O

265.340

Incinerator

What type of incinerator is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.).

List the types and quantities of hazardous waste incinerated.

Is the residue from the incinerator a hazardous waste?

What types of air pollution control devices (if any) are installed in the incinerator unit?

Is energy recovered from the process?

If yes, describe.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
What is the destruction and removal efficiency for the organic hazardous waste constituents?			

Does the operating record include additional analysis and to determine types of pollutants which might be emitted including:

Heating value of the waste?

— — —

Halogen and sulfur content?

— — —

Concentrations of lead and emergency?

— — —

If no to any of the above questions, is there justification and documentation?

— — —

If operating, does it appear the incinerator is operating at steady state for conditions of operation, including temperature and air flow?

— — —

Monitoring and Inspection

Are existing instruments relating to combustion and emission controls monitored every 15 minutes?

— — —

If no, explain.

Does the incinerator have all the following instruments for measuring: wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH?
(Circle missing instruments.)

YES NO N/A

If no, explain.

Is the stack plume observed visually at least hourly for opacity and color?

Are there any signs of leaks, spill and fugitive emission associated with the pumps, valves, conveyors, pipes, etc?

If yes, describe.

Are all emergency shutdown controls and system alarms checked to assure proper operation?

Is there any reason to believe the incinerator is being operated improperly? i.e., steady state condition are not maintained.

If yes, explain.

Is the incinerator inspected daily?

YES

NO

N/A

Is there open burning of hazardous waste?

—

—

—

If yes, what is being burned? (Only burning or detonation of explosives is permitted.)

—

—

—

If open burning or detonation of explosives is taking place, approximately what is the distance from the open burning or detonation to the property of others?

40 CFR 265 Subpart P

265.370

Chemical, Physical and Biological Treatment

(Other than in tanks, surface impoundments or plant treatment facilities)

Describe the treatment system at this facility and the types of wastes treated.

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
Does the treatment process system show any signs of ruptures, leaks or corrosion?	_____	_____	_____

If yes, describe.

Is there a means to stop the inflow of continuously-fed hazardous wastes?	_____	_____	_____
---	-------	-------	-------

Inspections

Is the discharge control safety equipment (e.g., waste feed cut-off systems, by-pass systems, drainage systems and pressure relief systems) in good working order?	_____	_____	_____
--	-------	-------	-------

Are they inspected at least once each operation day?	_____	_____	_____
--	-------	-------	-------

Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?	_____	_____	_____
---	-------	-------	-------

Is data gathered at least once each operating day?	_____	_____	_____
--	-------	-------	-------

Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?	_____	_____	_____
---	-------	-------	-------

Are the discharge confinement structures (e.g., dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation)?	_____	_____	_____
---	-------	-------	-------

Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or conditions which may cause it to ignite or react?

If yes, explain how.

Are the incompatible wastes placed in the same treatment process?

If yes, please explain.

<u>YES</u>	<u>NO</u>	<u>N/A</u>
------------	-----------	------------

_____	_____	_____
-------	-------	-------

_____	_____	_____
-------	-------	-------

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility:

Protaco

U.S. EPA I.D. No.:

PRD09108622

Street:

City:

State:

Zip Code:

Telephone:

Operator:

Street:

City:

State:

Zip Code:

Telephone:

Owner:

Street:

City:

State:

Zip Code:

Telephone:

Inspection Date: / /

Time: -

Weather Conditions:

Name

Affiliation

Telephone

Inspectors:

Facility Representatives:

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	<u> </u>	<u> </u>	<u> </u>
Transporter	<u> </u>	<u> </u>	<u> </u>
Treater	<u> </u>	<u> </u>	<u> </u>
Storer	<u> </u>	<u> ✓ </u>	<u> ✓ </u>
Disposer	<u> </u>	<u> </u>	<u> </u>

RCRA LAND DISPOSAL RESTRICTION INSPECTION
APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>					
1. F001	_____	_____	✓ _____	_____	_____
2. F002	_____	_____	✓ _____	_____	_____
3. F003	_____	_____	✓ _____	_____	_____
4. F004	_____	_____	✓ _____	_____	_____
5. F005	_____	_____	✓ _____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	Store	Disp.	Trans.
Arsenic 500 mg/L	_____	_____	✓ _____	_____	_____
Cadmium 100 mg/L	_____	_____	✓ _____	_____	_____
Chromium VI 500 mg/L	_____	_____	✓ _____	_____	_____
Lead 500 mg/L	_____	_____	✓ _____	_____	_____
Mercury 20 mg/L	_____	_____	✓ _____	_____	_____
Nickel 134 mg/L	_____	_____	✓ _____	_____	_____
Selenium 100 mg/L	_____	_____	✓ _____	_____	_____
Thallium 130 mg/L	_____	_____	✓ _____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	<u>✓</u>	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	<u>✓</u>	_____	_____
-------	-------	----------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	<u>Protec accepted</u>	<u>old transformer</u>
500 ppm	<u>oil without testing</u>	<u>for PCB</u>

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No _____ NA

If yes, state reasons for mixing:

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

_____	_____	<u>✓</u>	_____	_____
-------	-------	----------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

- _____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
_____ Pharmaceutical wastewater containing spent methylene chloride
_____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

_____ Yes _____ No _____ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

_____ Yes _____ No _____ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis**1. F-Solvent Wastes**

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

_____ Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, note how this is adequate: _____

- TCLP

_____ Yes _____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_____ Yes _____ No _____ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

_____ Yes _____ No _____ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☒ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, note how this is adequate: _____

- Testing

☐ Yes ☐ No ☐ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☐ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

C. Management**1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

_____ Yes _____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

_____ Yes _____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No

Identify off-site treatment or storage facilities: _____

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☐ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☐ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

_____ Yes _____ No

If yes, check the appropriate regulatory status:

_____ Interim status for storage

_____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

_____ Yes _____ No

- C. Is the waste treated in an exempt treatment process on-site?

_____ Yes _____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA

o California List ☐ Yes ☒ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

a. What date was the waste analysis plan last revised? _____

b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: BW Lab

c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

d. Describe the frequency of sampling: every shipment

e. Describe procedures used to identify manifest discrepancies:

Test for pH, Gluepoint, Cyanide & Soluble

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment

2. If yes, check the appropriate method.

☐ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

Date entering storage area is recorded in the log book only.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☒ Yes ☐ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☒ No

If yes, state how:

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ☒ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ☒ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Describe frequency of testing treatment residuals:

5. Is dilution used as a substitute for treatment?

____ Yes ____ No

6. Are notifications prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) _____ Yes _____ No

Applicable treatment standards _____ Yes _____ No

Manifest number _____ Yes _____ No

Waste analysis data, if available _____ Yes _____ No

Certification that the waste meets the treatment standards _____ Yes _____ No

Identify off-site disposal facilities: _____

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ ☒ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

____ Yes ____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

____ Yes ____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge ____ Yes ____ No

Supernatant ____ Yes ____ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

____ Yes ____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

____ Yes ____ No

- c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

- d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

_____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl benzene	<input type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexanone	<input type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 waste stream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☐ No

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

☐ Yes ☐ No
☐ Yes ☐ No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

☐ Yes ☐ No
☐ Yes ☐ No
☐ Yes ☐ No
☐ Yes ☐ No
☐ Yes ☐ No

6. Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

- (a) Are the constituents used as chemical carriers?

☐ Yes ☐ No

If yes, list the constituents.

- (b) Are the constituents used for degreasing/cleaning?

☐ Yes ☐ No

If yes, list the constituents.

- (c) Are the constituents used as diluents?

☐ Yes ☐ No

If yes, list the constituents.

- (d) Are the constituents used as extractants?

☐ Yes ☐ No

If yes, list the constituents.

(e) Are the constituents used for fabric scouring?

___ Yes ___ No

If yes, list the constituents.

(f) Are the constituents used as reaction and synthesis media?

___ Yes ___ No

If yes, list the constituents.

If the responses to questions 1 through 6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? (A solvent is considered "spent" when it has been used and is no longer usable without being regenerated, reclaimed, or otherwise reprocessed.)

___ Yes ___ No

8. If the waste is a mixture of constituents as determined in questions 1 through 6, give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5%	methylene chloride
2%	trichloroethylene
25%	1,1,1-trichloroethane
<u>68%</u>	mineral spirits
100%	

If the waste stream is a mixture containing a total of 10% or more (by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the waste stream is mixed and contains only F003 constituents, it is a listed waste. For example:

33%	acetone
16%	methanol
<u>51%</u>	ethyl ether
100%	

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

APPENDIX B
TREATMENT STANDARDS FOR F-SOLVENTS

F001-F005 SPENT SOLVENTS	CONCENTRATION (IN MG/L)	
	WASTEWATERS	OTHER WASTES
Acetone	0.05	0.59
N-butyl	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.65	.125
Ethyl acetate	.05	.75
Ethyl benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
<hr/>				

Exhibit #1

Manifests from Digital



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COMMONWEALTH OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD
P.O. Box 11488, Santurce, Puerto Rico 00910

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Digital Equipment Corporation P.O. Box 106 San Germán, Puerto Rico 00753		ROAD 368 Km 2.4 SABANA GRANDE, PR 00747		A. State Manifest Document Number		
4. Generator's Phone (809) 892-1946		5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		B. State Generator's ID		
6. US EPA ID Number P.R.D.000706333		7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		C. State Transporter's ID		
8. US EPA ID Number P.R.T.090559360		9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT ALABAMA HIGHWAY 17 AT MILE MARKER 163 EMELLE, ALABAMA 35459		D. Transporter's Phone 833-5985		
10. US EPA ID Number A.L.D.000622464		11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM PROFILE # J - 24982		E. State Transporter's ID		
12. Containers No. Type		13. Total Quantity		14. Unit M/Vol		
20 B A		20		M		
15. Special Handling Instructions and Additional Information TRAILER # TOLU 481-CHQ-6		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway and ocean according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name LUIS A. URETA		
18. Transporter 2 Acknowledgement or Receipt of Materials Printed/Typed Name Orlando Gonzalez		Signature Orlando Gonzalez		Month Day Year 10/15/88		
19. Discrepancy Indication Space		Signature		Month Day Year		
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19		Signature		Month Day Year		

IN CASE OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No P R D 0 0 0 7 0 6 3 3 3 8 8 2 4 4		Manifest Document No 2 4 4		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A. State Manifest Document Number N/A							
4 Generator's Phone (809) 892-1946						B. State Generator's ID SABANA GRANDE							
5 Transporter 1 Company Name PROTECO						C. State Transporter's ID 19-RP-1747							
6 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2						D. Transporter's Phone 836-2058							
7 Transporter 2 Company Name N/A						E. State Transporter's ID N/A							
8 US EPA ID Number						F. Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G. State Facility's ID N/A							
10 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2						H. Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No. Type		13 Total Quantity		14 Unit Wt./Vol		15 Waste No.	
a. HAZARDOUS WASTE SOLID, N.O.S.													
b. ORM-E NA 9189													
c. PROTECO Profile Number P 2022													
d. 0 2 0 C M 0 0 0 2 0													
e. T F006													
f. PROTECO Profile Number													
g. PROTECO Profile Number													
h. PROTECO Profile Number													
J. Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. S01 c. b. d.							
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE ENDED AT PROTECO 9/15/88 PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. UNIT TRAILER No. CONU 4928295 TEMPORARY STORAGE I.D. No. PRT000706366/EQB No. 17													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name LUIS URETA						Signature 						Month Day Year 09/03/88	
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Humberto YARGAS						Signature 						Month Day Year 09/03/88	
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name ORLANDO GONZALEZ TRUCKING RAMON COLON						Signature 						Month Day Year 9/15/88	
19 Discrepancy Indication Space													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		P RD 0 00 7 06 3 33 18 8 24 5		A State Manifest Document Number N/A		
4 Generator's Phone (809) 892-1946		6 US EPA ID Number		B State Generator's ID SABANA GRANDE		
5 Transporter 1 Company Name PROTECO		P RD 0 91 0 18 6 2 2		C State Transporter's ID 19-15157-R		
7 Transporter 2 Company Name N/A		8 US EPA ID Number		D Transporter's Phone 836-2058		
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		10 US EPA ID Number		E State Transporter's ID N/A		
		P R D 0 9 1 0 1 8 6 2 2		F Transporter's Phone N/A		
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12 Containers		13 Total Quantity		14 Unit Wt/Vol
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022		No. Type				I Waste No.
b PROTECO Profile Number		0 20 C 10 0 0 2 0 T				F006
c PROTECO Profile Number						
d PROTECO Profile Number						
J Additional Descriptions for Materials Listed Above		K Handling Codes for Wastes Listed Above				
a. CONTAMINATED SOIL		a. S01 c.				
		b. d.				
15 Special Handling Instructions and Additional Information						
TEMPORARY STORAGE UNIT TRAILER No. SCXU 4475246 PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. TEMPORARY STORAGE ENDED AT PROTECO 9/21/88 I.D. No. PRT 000706366/EQB#17						
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name LUIS URETA		Signature 			Month Day Year 10 9 1988	
17 Transporter 1 Acknowledgement of Receipt of Materials		Signature CARLOS F. BARTOLOMEI			Month Day Year 10 9 10 1988	
18 Transporter 2 Acknowledgement of Receipt of Materials		Signature ORLANDO GONZALEZ TRUCKING			Month Day Year 10 9 10 1988	
19 Discrepancy Indication Space						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		4 Generator's Phone (809) 892-1946		A State Manifest Document Number N/A		
5 Transporter 1 Company Name PROTECO		6 US EPA ID Number PR D0 0 07 0 63 13 3 188 24 6		C State Transporter's ID 19-16449-R		
7 Transporter 2 Company Name N/A		8 US EPA ID Number PR D0 9 10 1 86 12 2		D Transporter's Phone 836-2058		
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		10 US EPA ID Number PR D0 9 10 1 86 12 2		E State Transporter's ID N/A		
				F Transporter's Phone N/A		
				G State Facility's ID N/A		
				H Facility's Phone (809) 836-2058		
11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12 Containers No. Type		13 Total Quantity	14 Unit Wt/Vol	15 Waste No.
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022		0 2 0 CM 0 00 20 T				F006
b PROTECO Profile Number						
c PROTECO Profile Number						
d PROTECO Profile Number						
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL		K. Handling Codes for Wastes Listed Above a. S01 c. b. d.				
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE TEMPORARY STORAGE ENDED AT PROTECO 9/15/88 UNIT TRAILER # TOLU 4810486		PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. I.D. No. PRT000706366/ EQB No. 17				
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name: LUIS URETA Signature: [Signature] Month Day Year: 09/03/88						
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: [Signature] Signature: [Signature] Month Day Year: 09/03/88						
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: ORLANDO GONZALEZ TRUCKING Signature: [Signature] Month Day Year: 09/03/88						
19 Discrepancy Indication Space						
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19 Printed/Typed Name: MARFA HERNANDEZ Signature: [Signature] Month Day Year: 09/03/88						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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Form Approved OMB No 2050-0039 Expires 9-30-89

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		PR D 00 0 7 063 3 3 88 2 47		A State Manifest Document Number N/A		
4 Generator's Phone (809) 892-1946		6 US EPA ID Number		B State Generator's ID SABANA GRANDE		
5 Transporter 1 Company Name PROTECO		PR D 09 1 0 18 6 22		C State Transporter's ID 19= 14374-R		
7 Transporter 2 Company Name N/A		8 US EPA ID Number		D Transporter's Phone 836-2058		
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		10 US EPA ID Number		E State Transporter's ID N/A		
		PR D 0 9 1 0 1 8 6 2 2		F Transporter's Phone N/A		
				G State Facility's ID N/A		
				H Facility's Phone (809) 836-2058		
11 US DGT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12 Containers No	Type	13 Total Quantity	14 Unit Wt/Vol	I Waste No.
a. HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022		0 20	CM	0 00 2 0	T	F006
b. PROTECO Profile Number						
c. PROTECO Profile Number						
d. PROTECO Profile Number						
J Additional Descriptions for Materials Listed Above		K Handling Codes for Wastes Listed Above				
a. CONTAMINATED SOIL		a. S01 c.				
		b. d.				
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE UNIT TRAILER # XCLU 4807837 PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. TEMPORARY STORAGE ENDED AT PROTECO 9/15/88 I.D. No. PR000706366/EQB No. 17						
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name LUIS URETA		Signature 			Month Day Year 09 10 1988	
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name Jose Rodriguez 1744		Signature 			Month Day Year 10 9 10 1988	
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name ORLANDO GONZALEZ TRUCKING		Signature 			Month Day Year 09 11 1988	
19 Discrepancy Indication Space						
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		1 PR DO 0 07 0 63 3 3 88 2 48		A State Manifest Document Number N/A		
4 Generator's Phone (809) 892-1946		5 US EPA ID Number		B State Generator's ID SABANA GRANDE		
5 Transporter 1 Company Name PROTECO		6 US EPA ID Number		C State Transporter's ID 19-BP 1741		
7 Transporter 2 Company Name N/A		8 US EPA ID Number		D Transporter's Phone 836-2058		
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		10 US EPA ID Number		E State Transporter's ID N/A		
		11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		F Transporter's Phone N/A		
		12 Containers		G State Facility's ID N/A		
		13 Total Quantity		H Facility's Phone (809) 836-2058		
		14 Unit Wt/Vol		I Waste No.		
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022		0 2 0 C M 00 0 2 0 T		F006		
b PROTECO Profile Number						
c PROTECO Profile Number						
d PROTECO Profile Number						
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL		K Handling Codes for Wastes Listed Above a. S01 c. b. d.				
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE ENDED AT PROTECO 9/19/88 TEMPORARY STORAGE UNIT TRAILER No. TOLU-482237-9		PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. I.D. No. PRT 000706366/EQB #17				
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations						
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford						
Printed/Typed Name LUIS URETA		Signature 		Month Day Year 09 03 88		
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Francisco Sanchez		Signature 		Month Day Year 10 07 88		
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Carlos Barrero		Signature 		Month Day Year 10 9 19 88		
19 Discrepancy Indication Space						
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0438

GENERATOR

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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No		Manifest Document No		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A State Manifest Document Number N/A							
4 Generator's Phone (809) 892-1946						B State Generator's ID SABANA GRANDE							
5 Transporter 1 Company Name PROTECO						C State Transporter's ID 19-16328-R							
6 US EPA ID Number PR D 09 110 18 6 22						D Transporter's Phone 836-2058							
7 Transporter 2 Company Name N/A						E State Transporter's ID N/A							
8 US EPA ID Number						F Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G State Facility's ID N/A							
10 US EPA ID Number PR D 09 110 18 6 22						H Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No. Type		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022						02 0 CH 0 00 2 0 T						F006	
b PROTECO Profile Number													
c PROTECO Profile Number													
d PROTECO Profile Number													
J Additional Descriptions for Materials Listed Above a, CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above b. S01 c. d.							
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE ENDED AT PROTECO 9/21/88 PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. TEMPORARY STORAGE I.D. No. 000706366/EQB # 17 UNIT TRAILER No. XTRU-671058-4													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name LUIS URETA						Signature 				Month Day Year 09/10/88			
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Concepcion Torres						Signature 				Month Day Year 09/10/88			
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Orlando Gonzalez Trucking						Signature 				Month Day Year 09/10/88			
19 Discrepancy Indication/Space													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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Form Approved OMB No 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		PR D 0 0 0 7 0 6 3 3 3 8 8 2 5 0		A. State Manifest Document Number N/A		
4 Generator's Phone 1 809 1 892-1946	5 Transporter 1 Company Name PROTECO	6 US EPA ID Number PR D 0 9 1 0 1 8 6 2 2	B. State Generator's ID SABANA GRANDE 16323-R			
7 Transporter 2 Company Name N/A	8 US EPA ID Number	C. State Transporter's ID 19-15388-R				
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico	10 US EPA ID Number PR D 0 9 1 0 1 8 6 2 2	D. Transporter's Phone 836-2058				
		E. State Transporter's ID N/A				
		F. Transporter's Phone N/A				
		G. State Facility's ID N/A				
		H. Facility's Phone (809) 836-2058				
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022		12 Containers No Type	13 Total Quantity	14 Unit Wt/Vol	I Waste No.	
a		0 2 0	GM	0 0 0 2 0	T F006	
b						
c						
d						
J. Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL		K. Handling Codes for Wastes Listed Above a. S01 c. b. d.				
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE ENDED AT PROTECO 9/27/88 TEMPORARY STORAGE UNIT TRAILER # CONU 491837-9 PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. I.D. NO. PRT000706366/EOB NO.17						
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name: LUIS URETA Signature: [Signature] Month Day Year: 09/03/88						
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name: Carlos Torres Signature: [Signature] Month Day Year: 09/07/88						
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name: Sigfredo Duilio Rod Signature: [Signature] Month Day Year: 09/27/88						
19 Discrepancy Indication Space						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No P R D 0 0 0 7 0 6 3 3 3 8 8 2 5 1		Manifest Document No 8 2 5 1		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A State Manifest Document Number							
4 Generator's Phone (809) 892-1946						B State Generator's ID N/A							
5 Transporter 1 Company Name PROTECO						C State Transporter's ID 19-1747-HF							
6 US EPA ID Number P R D 0 0 1 0 1 8 6 2 2						D Transporter's Phone 836-2058							
7 Transporter 2 Company Name N/A						E State Transporter's ID N/A							
8 US EPA ID Number						F Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G State Facility's ID N/A							
10 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2						H Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No Type		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022						0 2 0		GM 0 0 0 2 0		T		F 006	
b PROTECO Profile Number													
c PROTECO Profile Number													
d PROTECO Profile Number													
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. S01 c. b. d.							
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE ENDED AT PROTECO 9/21/88 PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. TEMPORARY STORAGE I.D. No. PRT 000706366/EQB # 17 UNIT TRAILER No. TRIU 040076-I													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed Typed Name LUIS URETA						Signature 				Month Day Year 10/9/88			
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name Humberto VARGAS						Signature 				Month Day Year 10/9/88			
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name Orlando Gonzalez Trucking						Signature 				Month Day Year 10/9/88			
19 Discrepancy Indication Space													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No PRD00070633388252		Manifest Document No 2		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A State Manifest Document Number N/A							
4 Generator's Phone (809) 892-1946						B State Generator's ID SABANA GRANDE							
5 Transporter 1 Company Name PROTECO						C State Transporter's ID 19-15157-R							
6 US EPA ID Number PRD091018622						D Transporter's Phone 836-2058							
7 Transporter 2 Company Name N/A						E State Transporter's ID N/A							
8 US EPA ID Number						F Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G State Facility's ID N/A							
10 US EPA ID Number PRD091018622						H Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No. Type		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022						020 CM 00020 T						F006	
b PROTECO Profile Number													
c PROTECO Profile Number													
d PROTECO Profile Number													
J Additional Descriptions for Materials Listed Above a. CONTAMIANATED SOIL						K. Handling Codes for Wastes Listed Above a. S01 b. c. d.							
15 Special Handling Instructions and Additional Information UNIT TRAILER # TRIU-040070-9 TEMPORARY STORAGE TEMPORARY STORAGE ENDED AT PROTECO 9/27/88						PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. I.D. NO. PRT000706366/ EQB 17							
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford													
Printed/Typed Name LUIS URETA						Signature 				Month Day Year 10/10/88			
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name CARLOS F. BARTOLOMEI						Signature 				Month Day Year 10/10/88			
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name Carlos Borrero						Signature 				Month Day Year 09/27/88			
19 Discrepancy Indication Space													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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Form Approved OMB No 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address		PRD00070633388253		A State Manifest Document Number		
DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753				B State Generator's ID		
4 Generator's Phone (809) 892-1946				SABANA GRANDE		
5 Transporter 1 Company Name		6 US EPA ID Number		C State Transporter's ID		
PROTECO		PRD0091018622		19 16388-K		
7 Transporter 2 Company Name		8 US EPA ID Number		D Transporter's Phone		
N/A				836-2058		
9 Designated Facility Name and Site Address		10 US EPA ID Number		E State Transporter's ID		
PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico				N/A		
				F Transporter's Phone		
				N/A		
				G State Facility's ID		
				N/A		
				H Facility's Phone		
				(809) 836-2058		
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12 Containers No	13 Total Quantity	14 Unit Wt/Vol	I Waste No.	
a HAZARDOUS WASTE SOLID, N.O.S.						
ORM-E NA 9189 PROTECO Profile Number P 2022		0 20	CM	0 00 20	T	F006
b PROTECO Profile Number						
c PROTECO Profile Number						
d PROTECO Profile Number						
J Additional Descriptions for Materials Listed Above		K Handling Codes for Wastes Listed Above				
a. CONTAMINATED SOIL		b. S01 c. d.				
15 Special Handling Instructions and Additional Information						
TEMPORARY STORAGE ENDED AT PROTECO 10/14/88 PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC.						
TEMPORARY STORAGE UNIT TRAILER # TCU 841234-2 I.D. NO. PRD000706366/EOB NO. 17						
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.						
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed Typed Name		Signature		Month Day Year		
LUIS URETA				09 03 88		
17 Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Printed Typed Name		Signature		Month Day Year		
Concepcion Torres				10 03 88		
18 Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Printed Typed Name		Signature		Month Day Year		
Ruben Borrero				10 01 88		
19 Discrepancy Indication Space						

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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		PRD00070633388254		A. State Manifest Document Number N/A		
4 Generator's Phone (809) 892-1946		6 US EPA ID Number		B. State Generator's ID SABANA GRANDE		
5 Transporter 1 Company Name PROTECO		8 US EPA ID Number PRD091018622		C. State Transporter's ID 19-16328-R		
7 Transporter 2 Company Name N/A		10 US EPA ID Number		D. Transporter's Phone 836-2058		
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		12 Containers No Type		E. State Transporter's ID N/A		
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022		13 Total Quantity 0 2 0 C M 0 0 0 2 0 T		F. Transporter's Phone N/A		
a		14 Unit Wt/Vol		G. State Facility's ID N/A		
b		15 Waste No.		H. Facility's Phone (809) 836-2058		
c						
d						
J. Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL		K. Handling Codes for Wastes Listed Above a. S01 c. b. d.				
15 Special Handling Instructions and Additional Information UNIT TRAILER # XCU- 480235-2 TEMPORARY STORAGE TEMPORARY STORAGE ENDED AT PROTECO 9/27/88		I.D. NO. PRT 000706366 / EQB NO. 1 PICKED UP BY ORLANDO GONZALEZ		TRUCKING, INC.		
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name LUIS URETA		Signature 		Month Day Year 12 9 1988		
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Ruben Borrero		Signature 		Month Day Year 09 03 88		
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Ruben Borrero		Signature 		Month Day Year 12 12 88		
19 Discrepancy Indication Space						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No		Manifest Document No		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A. State Manifest Document Number N/A							
4 Generator's Phone (809) # 892-1946						B. State Generator's ID SABANA GRANDE							
5 Transporter 1 Company Name PROTECO						C. State Transporter's ID 19-15157-R							
6 US EPA ID Number PRD0091018622						D. Transporter's Phone 836-2058							
7 Transporter 2 Company Name N/A						E. State Transporter's ID N/A							
8 US EPA ID Number						F. Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G. State Facility's ID N/A							
10 US EPA ID Number PRD091018622						H. Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No Type		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a. HAZARDOUS WASTE SOLID, N.O.S.													
b. ORN-E NA 9189 PROTECO Profile Number P 2022						020		CM00020		T		E006	
c. PROTECO Profile Number													
d. PROTECO Profile Number													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
a. CONTAMINATED SOIL						a. S01 c.							
						b. d.							
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE ENDED AT PROTECO (10/06/88) PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC. TEMPORARY STORAGE I.D. NO. PRT000706366/EQB NO. 1 UNIT TRAILER # TPUH-410898-2													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed Typed Name						Signature				Month Day Year			
LUIS URETA										10/03/88			
17 Transporter 1 Acknowledgement of Receipt of Materials						Signature				Month Day Year			
CARLOS F. BARTOLAMEI										10/03/88			
18 Transporter 2 Acknowledgement of Receipt of Materials						Signature				Month Day Year			
Carlos Borrero										10/04/88			
19 Discrepancy Indication Space													
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

GENERATOR

TRANSPORTER

FACILITY



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Form Approved OMB No 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No P R D 0 0 0 7 0 6 3 3 3 1 8 8 2 5 1 6		Manifest Document No of 1		2 Page 1 Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITALEQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753				A State Manifest Document Number N/A			
				B State Generator's ID SABANA GRANDE			
4 Generator's Phone (809) 892-1946		5 Transporter 1 Company Name PROTECO		6 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2		C State Transporter's ID 19-1747-RP	
7 Transporter 2 Company Name N/A		8 US EPA ID Number		D Transporter's Phone 836-2058		E State Transporter's ID N/A	
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		10 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2		F Transporter's Phone N/A		G State Facility's ID N/A	
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022				12 Containers No Type		13 Total Quantity	
				14 Unit Wt/Vol		15 Waste No.	
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL				12 Containers No Type		13 Total Quantity	
				14 Unit Wt/Vol		15 Waste No.	
				12 Containers No Type		13 Total Quantity	
				14 Unit Wt/Vol		15 Waste No.	
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE ENDED AT PROTECO 10-24-88 TEMPORARY STORAGE UNIT TRAILER # XTRU-671442-4 PICKED UP BY ORLANDO GONZALEZ TRUCKING, INC I.D.NO.PRT000706366/EQB NO.17				K. Handling Codes for Wastes Listed Above a. S01 b. c. d.			
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed Typed Name LUIS URETA				Signature 		Month Day Year 05/05/88	
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name HUMBERTO VARGAS				Signature 		Month Day Year 10/10/88	
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name RAMON COLON 1631RP				Signature 		Month Day Year 11/02/88	
19 Discrepancy Indication Space							



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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No. P R D 0 0 0 7 0 6 1 3 3 3 8 8 2 5 7		Manifest Document No. 2 Page 1 of 1		Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753				A State Manifest Document Number N/A			
4 Generator's Phone 809 892-1946				B State Generator's ID SABANA GRANDE			
5 Transporter 1 Company Name PROTECO		6 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2		C State Transporter's ID 19-14371-R		D Transporter's Phone 836-2058	
7 Transporter 2 Company Name N/A		8 US EPA ID Number		E State Transporter's ID N/A		F Transporter's Phone N/A	
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico				10 US EPA ID Number		G State Facility's ID N/A	
				H Facility's Phone (809) 836-2058			
11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)				12 Containers No Type		13 Total Quantity	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-F NA 9189 PROTECO Profile Number p 2022				0 2 0 C H C 0 0 2 0 T		F 006	
b PROTECO Profile Number							
c PROTECO Profile Number							
d PROTECO Profile Number							
J Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
a. CONTAMINATED SOIL				a. S 01 c.			
				b. d.			
15 Special Handling Instructions and Additional Information Temporary storage ended At PROTECO 9/28/88 Picked up by Delgado Gonzalez TENCING, INC. DO NOT RETORQUE 360/LAB NO. 17							
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed Typed Name LUIS URETA				Signature <i>Luis Ureta</i>		Month Day Year 09/03/88	
17 Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>José Rodríguez</i>		Month Day Year 10/9/03/88	
Printed Typed Name JOSÉ RODRÍGUEZ				Signature <i>Ramón Colón</i>		Month Day Year 09/01/88	
18 Transporter 2 Acknowledgement of Receipt of Materials				Signature <i>Ramón Colón</i>		Month Day Year 09/01/88	
Printed Typed Name RAMÓN COLÓN				Signature <i>Ramón Colón</i>		Month Day Year 09/01/88	
19 Discrepancy Indication Space							
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19							

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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Form Approved OMB No 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No. P R D 0 0 0 7 0 6 3 3 3 8 8 2 5 8	Manifest Document No. 2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITALEQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753			A State Manifest Document Number		
4 Generator's Phone (809) 892-1946			B State Generator's ID		
5 Transporter 1 Company Name PROTECO		6 US EPA ID Number P R D 0 0 1 9 1 8 6 2 2	C State Transporter's ID 19-14374-R		
7 Transporter 2 Company Name N/A		8 US EPA ID Number	D Transporter's Phone 836-2058		
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		10 US EPA ID Number	E State Transporter's ID N/A		
			F Transporter's Phone N/A		
			G State Facility's ID N/A		
			H Facility's Phone (809) 836-2058		
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)			12 Containers No Type	13 Total Quantity	14 Unit Wt/Vol
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number 2022			0 2 0 C M 0 0 0 2 0 T		I Waste No. P006
b PROTECO Profile Number					
c PROTECO Profile Number					
d PROTECO Profile Number					
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL			K. Handling Codes for Wastes Listed Above a. S01 c. b. d.		
15 Special Handling Instructions and Additional Information Temporary Storage ended at PROTECO 10/06/88. unit trailer #INBU - 999765-4 TEMPORARY STORAGE			Picked up by Orlando Contreras Trucking Inc. ID No PRD00706366/EQN # 17		
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed Typed Name LUIS URETA			Signature 		Month Day Year 10/9/88
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name Jose Rodriguez			Signature 		Month Day Year 10/9/88
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name Ruben Borrero			Signature 		Month Day Year 10/9/88
19 Discrepancy Indication Space					

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0438



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Form Approved: OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address		PRD00070633388259		A State Manifest Document Number		
DIGITALEQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753				N/A		
4 Generator's Phone (809) 892-1946				B State Generator's ID		
5 Transporter 1 Company Name		6 US EPA ID Number		C State Transporter's ID		
PROTECO		PRD091018622		SABANA GRANDE 19-14374-A		
7 Transporter 2 Company Name		8 US EPA ID Number		D Transporter's Phone		
N/A				836-2058		
9 Designated Facility Name and Site Address		10 US EPA ID Number		E State Transporter's ID		
PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		PRD091018622		N/A		
				F Transporter's Phone		
				N/A		
				G State Facility's ID		
				N/A		
				H Facility's Phone		
				(809) 836-2058		
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12 Containers		13 Total Quantity		14 Unit Wt/Vol
		No. Type				I Waste No.
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022		02 0 C N		00020 T		F006
b						
c						
d						
J Additional Descriptions for Materials Listed Above		K Handling Codes for Wastes Listed Above				
a. CONTAMINATED SOIL		a. S01 c.				
		b. d.				
15 Special Handling Instructions and Additional Information		Picked up by Orlando Contreras Tracking inc 10 No PRD0070633388259/EQB#17				
Temporary storage ended at PROTECO 10-06-88 TEMPORARY STORAGE Unit Trailer # CONU 493033-2						
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.						
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford						
Printed Typed Name		Signature		Month Day Year		
LUIS URETA		[Signature]		10/9/10/7/88		
17 Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
T Jose Rodriguez		[Signature]		10/9/10/7/88		
18 Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Sifredo Avila Rod		[Signature]		11/0/06/88		
19 Discrepancy Indication Space						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No. P R D 0 0 0 7 0 6 3 3 3 1 8 8 2 6 0		Manifest Document No. 8 2 6 0		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A State Manifest Document Number N/A							
4 Generator's Phone (809) 892-1946						B State Generator's ID SABANA GRANDE							
5 Transporter 1 Company Name PROTECO						C State Transporter's ID 19-15157-R							
6 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2						D Transporter's Phone 836-2058							
7 Transporter 2 Company Name						E State Transporter's ID N/A							
8 US EPA ID Number						F Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G State Facility's ID N/A							
10 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2						H Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No. Type		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number 2022						D 2 0 C M 0 0 0 2 0 T						F 006	
b PROTECO Profile Number													
c PROTECO Profile Number													
d PROTECO Profile Number													
J. Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. S 01 c. b. d.							
15 Special Handling Instructions and Additional Information Temporary storage ended at Proteco 10-07-88 Picked up by Orlando Gonzalez Inc. 10-07-88 unit Trailer # XTR 4-671352-0 10-07-88													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name LUIS URETA						Signature [Signature]						Month Day Year 08 07 88	
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name CARLOS F. BARTOLOMEI						Signature [Signature]						Month Day Year 09 07 88	
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Carlos Borrero						Signature [Signature]						Month Day Year 10 07 88	
19 Discrepancy Indication Space													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No. PRD00070633388261		Manifest Document No. 1		2 Page 1 of 1		Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753				6 US EPA ID Number PRD091018622		A State Manifest Document Number N/A		B State Generator's ID SABANA GRANDE	
4 Generator's Phone 809 892-1946				5 Transporter 1 Company Name PROTECO		C State Transporter's ID 19-16328-12		D Transporter's Phone 836-2058	
7 Transporter 2 Company Name N/A				8 US EPA ID Number		E State Transporter's ID N/A		F Transporter's Phone N/A	
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico				10 US EPA ID Number PRD091018622		G State Facility's ID N/A		H Facility's Phone (809) 836-2058	
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12 Containers		13 Total Quantity		14 Unit Wt./Vol	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189				No 1 Type T		20		T	
PROTECO Profile Number P 2022				0 2 0 0 0 0 2 0		0 0 0 2 0		F 006	
b PROTECO Profile Number									
c PROTECO Profile Number									
d PROTECO Profile Number									
J Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above					
a. CONTAMINATED SOIL				a. S 01 c.					
				b. d.					
15 Special Handling Instructions and Additional Information Temporary storage ended at PROTECO 7-74 TEMPORARY STORAGE 10-24-88 Unit Trailer # STTU-403053-2				Picked up by Orlando Gonzalez Trucking, Inc. ID No. PRT000706366/EQB No. 17					
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.									
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed Typed Name LUIS HRETA				Signature <i>[Signature]</i>				Month Day Year 12/10/1988	
17 Transporter 1 Acknowledgement of Receipt of Materials				Printed Typed Name Concepcion Torres				Signature <i>[Signature]</i>	
								Month Day Year 10/9/1988	
18 Transporter 2 Acknowledgement of Receipt of Materials				Printed Typed Name Sigfredo Aviles Rod				Signature <i>[Signature]</i>	
								Month Day Year 11/02/1988	
19 Discrepancy Indication Space 0109 RP									
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19									

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0438



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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No P R D 0 0 0 7 0 6 3 3 3 8 8 2 6 2		Manifest Document No 2		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A State Manifest Document Number N/A							
4 Generator's Phone (809) 892-1946						B State Generator's ID							
5 Transporter 1 Company Name PROTECO						C State Transporter's ID SABANA GRANDE							
6 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2						D Transporter's Phone 19-163282							
7 Transporter 2 Company Name N/A						E State Transporter's ID 836-2058							
8 US EPA ID Number						F Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G State Facility's ID N/A							
10 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2						H Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No Type		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a. HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number 2022						0 2 0 C M		0 0 0 2 0		T		F006	
b. PROTECO Profile Number													
c. PROTECO Profile Number													
d. PROTECO Profile Number													
J. Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. S01 c. b. d.							
15 Special Handling Instructions and Additional Information Temporary storage ended at PROTECO 10/15/88 Picked UP By Orlando Gonzalez Trucking, Inc. TEMPORARY STORAGE E.D. NO. 000706366 / EPB#17 Unit trailer #XTRU-671024-4													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name LUIS URETA						Signature [Signature]							
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Gonzalez Torres						Signature [Signature]							
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Enrique Pagan						Signature [Signature]							
19 Discrepancy Indication Space													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

GENERATOR

TRANSPORTER

FACILITY



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P.O. Box 11488, Santurce, Puerto Rico 00910

2

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Form Approved OMB No 2050-0039 Expires 9-30-89

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No		Manifest Document No		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A State Manifest Document Number N/A							
4 Generator's Phone (809) 892-1946						B State Generator's ID N/A							
5 Transporter 1 Company Name PROTECO						C State Transporter's ID SABANA GRANDE 19-14374-2							
6 US EPA ID Number PRD0001018622						D Transporter's Phone 836-2058							
7 Transporter 2 Company Name N/A						E State Transporter's ID N/A							
8 US EPA ID Number						F Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G State Facility's ID N/A							
10 US EPA ID Number PRD091018622						H Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No Type		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022020000020T												F006	
b PROTECO Profile Number													
c PROTECO Profile Number													
d PROTECO Profile Number													
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. S 01 b. c. d.							
15 Special Handling Instructions and Additional Information Temporary storage ended at PROTECO 10/15/88 Unit TRAILER # XCLU 480378-6 Picked up By Orlando Gonzalez Trucking, Inc. I.D. NO. 000706366/EPB													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford													
Printed Typed Name JUIS HRETA						Signature Edgardo Aponte Pina Jimenez				Month Day Year 10 9 10 8 9 8			
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name Jose Rodriguez						Signature Jose Rodriguez				Month Day Year 10 9 10 8 9 8			
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name Sigfredo Aviles Rod.						Signature Sigfredo Aviles Rod.				Month Day Year 11 01 17 1988			
19 Discrepancy Indication Space 0109 RP													
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 Printed Typed Name Signature Month Day Year													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



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P.O. Box 11488, Santurce, Puerto Rico 00910

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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No P R D 0 0 0 7 0 6 3 3 3 1 8 8 2 6 4		Manifest Document No 1		2 Page 1 of 1		Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITALEQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753				A State Manifest Document Number N/A		B State Generator's ID N/A			
4 Generator's Phone (809) 892-1946				5 Transporter 1 Company Name PROTECO		6 US EPA ID Number P R D 0 0 1 0 1 8 6 2 2		C State Transporter's ID 19 15157-R	
7 Transporter 2 Company Name N/A				8 US EPA ID Number		D Transporter's Phone 836-2058		E State Transporter's ID N/A	
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico				10 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2		F Transporter's Phone N/A		G State Facility's ID N/A	
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12 Containers No Type		13 Total Quantity		14 Unit Wt/Vol	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-E NA 9189 PROTECO Profile Number P 2022				0 2 0 6 4 0 0 0 2 0 T		F 006			
b PROTECO Profile Number									
c PROTECO Profile Number									
d PROTECO Profile Number									
J. Additional Descriptions for Materials Listed Above 3. CONTAMINATED SOIL				K. Handling Codes for Wastes Listed Above a. S 01 c. b. d.					
15 Special Handling Instructions and Additional Information Temporary storage ended At PROTECO 10/14/88 Picked up by Orlando Gonzalez TEMPORARY STORAGE Trucking, Inc. Unit Trailer # SCXU # 446017-0 ID. No. PRT000706346/EQB No. 17									
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford									
Printed/Typed Name LUIS URETA				Signature <i>Luis Ureta</i>				Month Day Year 10 14 88	
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name CARLOS F. BARTOLOMEI				Signature <i>Carlos F. Bartolomei</i>				Month Day Year 10 16 88	
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name RAMON COLA				Signature <i>Ramon Cola</i>				Month Day Year 11 01 88	
19 Discrepancy Indication Space									
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19 Printed/Typed Name Signature Month Day Year									

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

GENERATOR

TRANSPORTER

FACILITY



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Form Approved OMB No. 2050-0039 Expires 9-30-88

2

**UNIFORM HAZARDOUS
WASTE MANIFEST**

1 Generator's US EPA ID No

Manifest
Document No

2 Page 1

Information in the shaded areas
is not required by Federal
law

3 Generator's Name and Mailing Address

P R D 000 7 0 6 1 3 3 3 1 8 8 2 6 5

DIGITAL EQUIPMENT CORPORATION

P.O. BOX 106 SABANA GRANDE, P.R. 00753

4 Generator's Phone 809/892-1946

5 Transporter 1 Company Name

PROTECO

7 Transporter 2 Company Name

N/A

6 Designated Facility Name and Site Address

PROTECO
Road 385, Km. 3.5
Peñuelas, Puerto Rico

6 US EPA ID Number

8 US EPA ID Number

10 US EPA ID Number

A State Manifest Document Number

B State Generator's ID

C State Transporter's ID

D Transporter's Phone 19-15157-1

E State Transporter's ID 836-2058

F Transporter's Phone N/A

G State Facility's ID N/A

H Facility's Phone

(809) 836-2058

11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12 Containers

No.

Type

13
Total
Quantity

14
Unit
Wt/Vol

15
Waste No.

HAZARDOUS WASTE SOLID, N.O.S.

ORM-E

NA 9189 PROTECO Profile Number

P 2022 02 0 CM 0 0 0 2 0 T F006

PROTECO Profile Number

PROTECO Profile Number

PROTECO Profile Number

J Additional Descriptions for Materials Listed Above

a. CONTAMINATED SOIL

K. Handling Codes for Wastes Listed Above

a. S 01

c.

b.

d.

15 Special Handling Instructions and Additional Information

TEMPORARY STORAGE

Temporary storage ended at PROTECO 10-24-88
Unit trailer # TROU-686092-3

Picked up by Orlando Gonzalez
Trucking, Inc.

ID No. PRT000706366/ERB No. 17

16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed Typed Name

LUIS URETA

Signature

Month Day Year

17 Transporter 1 Acknowledgement of Receipt of Materials

Printed Typed Name

Signature

Month Day Year

18 Transporter 2 Acknowledgement of Receipt of Materials

Printed Typed Name

Signature

Month Day Year

19 Discrepancy Indication Space

11/10/2014/88

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Form Approved OMB No 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No P R D 0 0 0 7 0 6 3 3 3 8 2 6 6		Manifest Document No 2		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.									
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106, SABANA GRANDE, P.R. 00753						A. State Manifest Document Number N/A											
						B. State Generator's ID SABANA GRANDE											
4. Generator's Phone (809) 892-1946						C. State Transporter's ID 46-15152-R											
5. Transporter 1 Company Name CARIBE HYDROBLASTING						D. Transporter's Phone 836-1110											
6. Transporter 1 US EPA ID Number P R D 0 8 0 5 2 5 9 5 0						E. State Transporter's ID N/A											
7. Transporter 2 Company Name N/A						F. Transporter's Phone N/A											
8. Transporter 2 US EPA ID Number N/A						G. State Facility's ID N/A											
9. Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						H. Facility's Phone (809) 836-2058											
10. Designated Facility US EPA ID Number P R D 0 9 1 0 1 8 6 2 2																	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) HAZARDOUS WASTE SOLID, N.O.S. (F006) ORM-E NA 9189 PROTECO Profile Number P 2022						12. Containers		13. Total Quantity		14. Unit Wt./Vol		1. Waste No.					
						No Type											
a. HAZARDOUS WASTE SOLID, N.O.S. (F006) ORM-E NA 9189 PROTECO Profile Number P 2022												F006					
b. PROTECO Profile Number																	
c. PROTECO Profile Number																	
d. PROTECO Profile Number																	
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above											
a. CONTAMINATED SOIL						a. S 01											
						b. c. d.											
15. Special Handling Instructions and Additional Information TEMPORARY STORAGE																	
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.																	
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.																	
Printed/Typed Name LUIS URETA						Signature <i>[Signature]</i>				Month Day Year 11/13/88							
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Roberto B. Velez				Signature <i>[Signature]</i>				Month Day Year 11/13/88			
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name				Signature				Month Day Year			
19. Discrepancy Indication Space																	
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19																	
Printed/Typed Name RENE RODRIGUEZ						Signature <i>[Signature]</i>				Month Day Year 11/30/88							



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ENVIRONMENTAL QUALITY BOARD

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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No		Manifest Document No		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106, SABANA GRANDE, P.R. 00753						A State Manifest Document Number							
4 Generator's Phone (809) 892-1946						B State Generator's ID N/A							
5 Transporter 1 Company Name CARIBE HYDROBLASTING						C State Transporter's ID 46-15152-R							
6 US EPA ID Number 1019180152159510						D Transporter's Phone 836-1110							
7 Transporter 2 Company Name N/A						E State Transporter's ID N/A							
8 US EPA ID Number						F Transporter's Phone N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G State Facility's ID N/A							
10 US EPA ID Number 1019180152159510						H Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a. HAZARDOUS WASTE SOLID, N.O.S. (P006) ORM-E NA 9189 PROTECO Profile Number P 2022						No Type						I. Waste No.	
b. PROTECO Profile Number						0 2 0		G M		0 0 0 2 0		T F 006	
c. PROTECO Profile Number													
d. PROTECO Profile Number													
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. S 01 c. b. d.							
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE From 11-29-88 to 1-18-89 Picked up by Orlando Gonzalez Trucking 1-19-89 Van ID # 403458-0													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed Typed Name LUIS HRETA ELIARDO AYOnte						Signature [Signature] Month Day Year 11/12/90							
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name Rafael Beltramo						Signature [Signature] Month Day Year 11/12/90							
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name Enrique Rodriguez R.R. 1628						Signature [Signature] Month Day Year 11/12/89							
19 Discrepancy Indication Space													
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA GRANDE, PR 00747 (809) 892-1946				A. State Manifest Document Number CWMA 431790		
4. Generator's Phone				B. State Generator's ID		
5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		6. US EPA ID Number IP RB ID 10 10 10 17 10 16 13 13 18 19 10 17		C. State Transporter's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number IP RB IT 10 19 10 15 15 19 13 16 10		D. Transporter's Phone 833-5985		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459				E. State Transporter's ID		
10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4				F. Transporter's Phone 833-5521		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J-24982				12. Containers No. Type 15 B A 15 M		
b. CWM Profile Number				13. Total Quantity		
c. CWM Profile Number				14. Unit Wt/Vol		
d. CWM Profile Number				15. Waste No. F006		
J. Additional Descriptions for Materials Listed Above SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE				K. Handling Codes for Wastes Listed Above D 81		
15. Special Handling Instructions and Additional Information TRAILER # SCXU 403-458-0				Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PH-223, U.S. Environmental Protection Agency, 401 Street S.W., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this manifest are true and accurate, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.				Printed/Typed Name LUIS A. URETA		
Signature 				Month Day Year 1 18 89		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Carlos Borrero				Signature 		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name				Signature		
19. Discrepancy Indication Space				Month Day Year		
20. Facility Owner or Operator: Certification of receipt of hazardous waste materials covered by this manifest except as noted in item 19.				Month Day Year		



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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No		Manifest Document No		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753						A State Manifest Document Number							
4 Generator's Phone (809) 1892-1946						B State Generator's ID							
5 Transporter 1 Company Name PROTECO						C State Transporter's ID							
6 US EPA ID Number PRD091018622						D Transporter's Phone 836-2058							
7 Transporter 2 Company Name						E State Transporter's ID							
8 US EPA ID Number						F Transporter's Phone							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						G State Facility's ID							
10 US EPA ID Number PRD091018622						H Facility's Phone (809) 836-2058							
11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
a HAZARDOUS WASTE SOLID, N.O.S. (ORM-E) NA 9189 PROTECO Profile Number P 2022						020		CH00020T				F 006	
b PROTECO Profile Number													
c PROTECO Profile Number													
d PROTECO Profile Number													
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. 501 c. b. d.							
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE From 12-1-88 to 1-11-89 Picked up by Orlando Gonzalez Trucking 1-12-89 Van ID # XTR4 671-350-0													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed Typed Name: LUIS ORTEGA Signature: [Signature] Month Day Year: 1/12/89													
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name: Jose Artu Signature: Jose Artu Month Day Year: 1/20/89													
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name: Enrique Rodriguez RPD/09 Signature: Enrique Rodriguez Month Day Year: 01/12/89													
19 Discrepancy Indication Space													
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19 Printed/Typed Name: Signature: Month Day Year:													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

GENERATOR

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HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

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Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA GRANDE, PR 00747 TEL. (809) 892-1946		P R D 0 0 0 7 0 6 1 3 3 3 1 8 9 0 0 2		A. State Manifest Document Number CWMA 431786		
5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		6. US EPA ID Number P R D 0 0 0 7 0 6 1 3 6 6		B. State Generator's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number P R D 0 0 0 5 5 9 1 3 6 0		C. State Transporter's ID		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		D. Transporter's Phone 833-5985		
				E. State Transporter's ID		
				F. Transporter's Phone 833-5521		
				G. State Facility's ID		
				H. Facility's Phone 205/652-9721		
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J-24982		No. Type 15 B A		15	M	F006
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		K. Handling Codes for Wastes Listed Above a. D 81				
15. Special Handling Instructions and Additional Information TRAILER # XTRU 671-350-0						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name LUIS A. URETA		Signature 		Month Day Year 1 1 89		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name ORLANDO GONZALEZ		Signature Orlando Gonzalez		Month Day Year 1 1 89		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						

Please print or type (Form designed for use on elite (12 pitch) typewriter)

Form Approved OMB No 2050-0039 Expires 9-30-89

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No PRD00070633338269		Manifest Document No 19-11-89		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106, SABANA GRANDE, P.R. 00753						A State Manifest Document Number N/A							
						B State Generator's ID SABANA GRANDE							
4 Generator's Phone (809) 892-1946						C State Transporter's ID 19-11-89							
5 Transporter 1 Company Name PROTECO						D Transporter's Phone 836-2058							
6 US EPA ID Number PRD001012622						E State Transporter's ID N/A							
7 Transporter 2 Company Name N/A						F Transporter's Phone N/A							
8 US EPA ID Number N/A						G State Facility's ID N/A							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						H Facility's Phone (809) 836-2058							
10 US EPA ID Number PRD091018622													
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers		13 Total Quantity		14 Unit Wt/Vol		15 Waste No.	
						No	Type						
a. HAZARDOUS WASTE SOLID, N.O.S.													
b. ORH-E NA 9189 PROTECO Profile Number p 2022						0	20	CM	0	00	2	0	F 006
c. PROTECO Profile Number													
d. PROTECO Profile Number													
e. PROTECO Profile Number													
J Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
a. CONTAMINATED SOIL						a. 501 c.							
						b. d.							
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE From 12-1-88 to 1-11-89 Picked up by Orlando Gonzalez Trucking Van ID No. SCXU 406-203-1													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed Typed Name LUIS URETA						Signature <i>[Signature]</i>				Month Day Year 11 20 1988			
17 Transporter 1 Acknowledgement of Receipt of Materials						Signature <i>[Signature]</i>				Month Day Year 11 20 1988			
Printed Typed Name Francisco Sanchez						Signature <i>[Signature]</i>				Month Day Year 11 20 1988			
18 Transporter 2 Acknowledgement of Receipt of Materials						Signature <i>[Signature]</i>				Month Day Year 10 11 1989			
Printed Typed Name Ruben Barreto RPO107						Signature <i>[Signature]</i>				Month Day Year 10 11 1989			
19 Discrepancy Indication Space													
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19													
Printed Typed Name RENE RODRIGUEZ						Signature <i>[Signature]</i>				Month Day Year 11 20 1988			

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type: (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA GRANDE, PR 00747 Generator's Phone (809) 892-1946		1. Generator's US EPA ID No. P R D 1 0 1 0 1 7 1 0 6 1 3 1 3 1 8 9 2 0 3		A. State Manifest Document Number CWMA 431787		
5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		6. US EPA ID Number P R D 1 0 1 0 1 7 1 0 6 1 3 1 6 6		C. State Transporter's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number P R T 1 0 9 1 0 5 1 5 9 3 1 6 0		D. Transporter's Phone 833-5985		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		E. State Transporter's ID		
				F. Transporter's Phone 833-5521		
				G. State Facility's ID		
				H. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	L. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J-24982		No. Type 15 B A		15	M	P006
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		K. Handling Codes for Wastes Listed Above a. D 81 c. b. d.				
15. Special Handling Instructions and Additional Information TRAILER # SCXU 406-203-1						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name LUIS A. URETA		Signature 		Month Day Year 1 11 89		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Orlando Gonzalez		Signature 		Month Day Year 1 11 89		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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Please print or type (Form designed for use on elite (12 pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of 1	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		4 Generator's Phone (809) 892-1946		A State Manifest Document Number N/A		
5 Transporter 1 Company Name PROTECO		6 US EPA ID Number PRD0001018622	C State Transporter's ID 19-17550-R			
7 Transporter 2 Company Name N/A		8 US EPA ID Number	D Transporter's Phone 836-2053			
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		10 US EPA ID Number	E State Transporter's ID N/A			
			F Transporter's Phone N/A			
			G State Facility's ID N/A			
			H Facility's Phone (809) 836-2058			
11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12 Containers No	13 Total Quantity	14 Unit Wt. Vol	I Waste No.	
a HAZARDOUS WASTE SOLID, N.O.S. ORM-2 NA 9169 PROTECO Profile Number P 2022		020	400	0.20	F 006	
b PROTECO Profile Number						
c PROTECO Profile Number						
d PROTECO Profile Number						
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL		K. Handling Codes for Wastes Listed Above a. S01 c. b. d.				
15 Special Handling Instructions and Additional Information Temporary Storage from 12-1-88 to 1-11-89 Picked up by Orlando Gonzalez Trucking 1-12-89 Van ID # TPAU 411-331-4						
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed Typed Name LINDA HERRERA		Signature		Month Day Year 12/1/88		
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name		Signature		Month Day Year 12/01/88		
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name		Signature		Month Day Year		
19 Discrepancy Indication Space						
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORP. ROAD 368 Km 2.4 SABANA GRANDE, PR 00747		4. Telephone Number TEL. (809) 892-1946		A. State Manifest Document Number CWMA 431781		
5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		6. US EPA ID Number P R D P O O 7 0 6 3 6 6		C. State Transporter's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number P R T O 9 0 5 5 9 3 6 0		D. Transporter's Phone 833-5985		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 36459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		E. State Transporter's ID		
				F. Transporter's Phone 833-5521		
				G. State Facility's ID		
				H. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J=24982		No. Type				
		1 5 B A		1 5	M	F006
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		K. Handling Codes for Wastes Listed Above				
		a. D 81				
		b.				
15. Special Handling Instructions and Additional Information TRAILER # TPU 411-331-4						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name LUIS A. URETA		Signature Angel Serrano		Month Day Year 1 2 0 8 8 8		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Ruben Berrero		Signature Ruben Berrero		Month Day Year 1 2 0 8 8 8		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. P R D 0 0 0 7 0 6 3 3 3	Manifest Document No. 8 8 1 0 1	22. Page 2	Information in the shaded areas is not required by Federal law.	
23. Generator's Name DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA GRANDE, PR 00747 TEL. (809) 892-1946				L. State Manifest Document Number CWMA 431781		
24. Transporter 3 Company Name CHEMICAL WASTE MANAGEMENT				M. State Generator's ID		
25. US EPA ID Number A I D 0 9 9 2 0 2 6 8 1				N. State Transporter's ID		
26. Transporter Company Name				O. Transporter's Phone		
27. US EPA ID Number				P. State Transporter's ID		
				Q. Transporter's Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		29. Containers		30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
		No.	Type			
a. CWM Profile Number						
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
e. CWM Profile Number						
f. CWM Profile Number						
g. CWM Profile Number						
h. CWM Profile Number						
i. CWM Profile Number						
S. Additional Descriptions for Materials Listed Above				T. Handling Codes for Wastes Listed Above		
				a.	d.	g.
				b.	e.	h.
				c.	f.	i.
32. Special Handling Instructions and Additional Information TRAILER # TPHU 411-331-4						
33. Transporter Acknowledgement of Receipt of Materials						Date
Printed/Typed Name			Signature			Month Day Year
34. Transporter Acknowledgement or Receipt of Materials						Date
Printed/Typed Name			Signature			Month Day Year
35. Discrepancy Indication Space						

GENERATOR

TRANSPORTER FACIL



Environmental
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COMMONWEALTH OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD
P.O. Box 11488, Santurce, Puerto Rico 00910

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Form Approved OMB No 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No	Manifest Document No	2. Page 1 of 1	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		4. Generator's Phone (809) 892-1946		5. State Manifest Document Number N/A		
6. Transporter 1 Company Name PROTECO		7. Transporter 1 US EPA ID Number PRD091018622		8. State Generator's ID SABANA GRANDE		
9. Transporter 2 Company Name		10. Transporter 2 US EPA ID Number		9. State Transporter's ID 19-17559-R		
10. Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		11. Designated Facility US EPA ID Number PRD091018622		10. State Transporter's ID 836-2058		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		
a. HAZARDOUS WASTE SOLID, N.O.S (F006) ORN-E NA 9189		No. Type		Unit		
b. PROTECO Profile Number P 2022020		CH 00 020		T		
c. PROTECO Profile Number						
d. PROTECO Profile Number						
14. Additional Descriptions for Materials Listed Above		15. Handling Codes for Wastes Listed Above		16. Waste No.		
a. CONTAMINATED SOIL		a. S 01		b.		
17. Special Handling Instructions and Additional Information		c.		d.		
18. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.		19. Temporary Storage		20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19		
I am a large quantity generator. I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		Printed/Typed Name LUIS URBETA		Signature <i>[Signature]</i>		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name José Rodríguez		Signature <i>[Signature]</i>		
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name José Rodríguez		Signature <i>[Signature]</i>		
19. Discrepancy Indication Space		20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19		Printed/Typed Name José Rodríguez		
				Signature <i>[Signature]</i>		
				Month Day Year 11/20/88		

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (800) 722-0436



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORP. ROAD 368 Km 2.4 SABANA GRANDE, PR 00747 Generator's Phone () 00747 TEL. (809) 892-1946		P R D 0 0 0 7 0 6 3 3 3 8 8 1 0 3		A. State Manifest Document Number CWMA 431783		
5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		6. US EPA ID Number P R D 0 0 0 7 0 6 3 6 6		B. State Generator's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number P R T 0 9 0 5 5 9 3 6 0		C. State Transporter's ID		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Erniele Facility Alabama Highway 17 at Mile Marker 163 Erniele, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		D. Transporter's Phone 833-5985		
				E. State Transporter's ID		
				F. Transporter's Phone 833-5521		
				G. State Facility's ID		
				H. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J-24982		No. Type				
		2 0 B A		2 0	M	F 006
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		a. D 81 c.				
		b. d.				
15. Special Handling Instructions and Additional Information						
TRAILER # XTRU 671-445-0						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name LUIS A. URETA		Signature Angel Serrano		Month Day Year 12 08 88		
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name Ruben Barrera		Signature Ruben Barrera		
				Month Day Year 12 08 88		
18. Transporter 2 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		
				Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name		Signature		Month Day Year		

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. P R D 0 0 0 7 0 6 3 3 3	Manifest Document No. 8 8 1 0 3	22. Page 2	Information in the shaded areas is not required by Federal law.	
23. Generator's Name DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA GRANDE, PR 00747 TEL. (809) 892-1946				L. State Manifest Document Number CWMA 431783		
24. Transporter 3 Company Name CHEMICAL WASTE MANAGEMENT, INC.		25. US EPA ID Number ALD 099202681		M. State Generator's ID		
26. Transporter Company Name		27. US EPA ID Number		N. State Transporter's ID		
				O. Transporter's Phone		
				P. State Transporter's ID		
				Q. Transporter's Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		29. Containers		30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
		No.	Type			
a. CWM Profile Number						
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
e. CWM Profile Number						
f. CWM Profile Number						
g. CWM Profile Number						
h. CWM Profile Number						
i. CWM Profile Number						
5. Additional Descriptions for Materials Listed Above				T. Handling Codes for Wastes Listed Above		
				a.	d.	g.
				b.	e.	h.
				c.	f.	i.
32. Special Handling Instructions and Additional Information TRAILER # XTRU 671-445-D						
33. Transporter Acknowledgement of Receipt of Materials						Date
Printed/Typed Name			Signature			Month Day Year
34. Transporter Acknowledgement or Receipt of Materials						Date
Printed/Typed Name			Signature			Month Day Year
35. Discrepancy Indication Space						

GENERATION

TRANSPORTER

FACILITY



Environmental
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COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address		PRD0007003		A. State Manifest Document Number		
DIGITAL EQUIPMENT CORPORATION P.O. BOX 106, SABANA GRANDE, P.R. 00751				B. State Generator's ID		N/A
4. Generator's Profile # 809 892-1946				C. State Transporter's ID		SABANA GRANDE
5. Transporter 1 Company Name		6. US EPA ID Number		D. Transporter's Phone		19-14-24-1
PROTECO				E. State Transporter's ID		636-2056
7. Transporter 2 Company Name		8. US EPA ID Number	22	F. Transporter's Phone		N/A
876				G. State Facility's ID		N/A
9. Designated Facility Name and Site Address		10. US EPA ID Number		H. Facility's Phone		(809) 836-2058
PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						
PRD091018622						
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt. Vol	1. Waste No.
a. HAZARDOUS WASTE SOILD, N.O.S. (F006) ORN-E NA 9189 PROTECO Profile Number P 2022		02	06M	006	20	T F006
b. PROTECO Profile Number						
c. PROTECO Profile Number						
d. PROTECO Profile Number						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
A. CONTAMINATED SOIL		a. S01 c.				
		b. d.				
15. Special Handling Instructions and Additional Information						
TEMPORARY STORAGE From 12-2-84 P. 12-14-86 P. 12-14-86 to 12-14-86 TOLU-821171-7						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations						
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford						
Printed Typed Name		Signature		Month Day Year		
EDUARDO AGUIRRE						
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Francisco Sanchez				12/14/86		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Ruben Barve		0107 R.P.		12/14/86		
19. Discrepancy Indication Space						
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19						

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0436



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA GRANDE, PR 00747		TEL. (809) 892-1946		A. State Manifest Document Number CWMA 431784		
5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		6. US EPA ID Number PRD000706366		C. State Transporter's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number PRT090559360		D. Transporter's Phone 833-5985		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number ALD000622464		E. State Transporter's ID		
				F. Transporter's Phone 833-5521		
				G. State Facility's ID		
				H. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J-24982		20	B/A	20	M	P006
b. CWM Profile Number						
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		K. Handling Codes for Wastes Listed Above a. D 81				
15. Special Handling Instructions and Additional Information TRAILER # TCLU 821-174-9						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name LUIS A. URETA		Signature Angel Serrano		Month Day Year 12 20 88		
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Ruben Borrero		Signature Ruben Borrero		Month Day Year 12 20 88		
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. P R D 0 0 0 7 0 6 3 3 3	Manifest Document No. 8 8 1 0 4	22. Page 2	Information in the shaded areas is not required by Federal law.	
23. Generator's Name DIGITAL EQUIPMENT CORP. ROAD 368 Km 2.4 SABANA GRANDE, PR [00747 TEL. (809) 892-1946				L. State Manifest Document Number CWMA 431784		
24. Transporter <u>3</u> Company Name CHEMICAL WASTE MANAGEMENT		25. US EPA ID Number A I D 0 9 9 2 0 2 6 8 1		M. State Generator's ID		
26. Transporter <u> </u> Company Name		27. US EPA ID Number		N. State Transporter's ID		
				O. Transporter's Phone		
				P. State Transporter's ID		
				U. Transporter's Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers No.	30. Total Quantity	31. Unit M/Vol
a.				Type		R. Waste No.
CWM Profile Number						
b.						
CWM Profile Number						
c.						
CWM Profile Number						
d.						
CWM Profile Number						
e.						
CWM Profile Number						
f.						
CWM Profile Number						
g.						
CWM Profile Number						
h.						
CWM Profile Number						
i.						
CWM Profile Number						
S. Additional Descriptions for Materials Listed Above				T. Handling Codes for Wastes Listed Above		
				a.	d.	g.
				b.	e.	h.
				c.	f.	i.
32. Special Handling Instructions and Additional Information TRAILER #TCLU 821-174-9						
33. Transporter Acknowledgement of Receipt of Materials						Date
Printed/Typed Name			Signature			Month Day Year
34. Transporter Acknowledgement or Receipt of Materials						Date
Printed/Typed Name			Signature			Month Day Year
35. Discrepancy Indication Space						

GENERATOR

TRANSPORTER



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

4

Please print or type (Form designed for use on elite (12 pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No.		Manifest Document No.		2 Page 1 of 1		Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106, SABANA GRANDE, P.R. 00753						A State Manifest Document Number N/A			
4 Generator's Phone (809) 892-1946						B State Generator's ID SABANA GRANDE			
5 Transporter 1 Company Name PROTECO						6 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2		C State Transporter's ID 19-17550-A	
7 Transporter 2 Company Name N/A						8 US EPA ID Number N/A		D Transporter's Phone 836-2058	
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico						10 US EPA ID Number P R D 0 9 1 0 1 8 6 2 2		E State Transporter's ID N/A	
								F Transporter's Phone N/A	
								G State Facility's ID N/A	
								H Facility's Phone (809) 836-2058	
11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers		13 Total Quantity	
						No. Type		14 Unit Wt-Vol	
a HAZARDOUS WASTE SOILD, N.O.S. (FO06) ORN-E NA 9189 PROTECO Profile Number 2022						0 2 0		0 0 0 2 0	
b PROTECO Profile Number									
c PROTECO Profile Number									
d PROTECO Profile Number									
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. S01 c. b. d.			
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE From 10/2/88 to 12/31/88 11/2/88 YLEU-400042-4									
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford									
Printed Typed Name LUIS URETA						Signature <i>[Signature]</i>		Month Day Year 11/2/88	
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name <i>[Signature]</i>						Signature <i>[Signature]</i>		Month Day Year 11/2/88	
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name Carlos Borjas						Signature <i>[Signature]</i>		Month Day Year 11/2/88	
19 Discrepancy Indication Space									
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19									

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0436



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORP. ROAD 368 Km 2.4 SABANA GRANDE, PR 00747 4. Generator's Phone () TEL. (809) 892-1946		5. US EPA ID Number IP IR ID 10 10 17 10 16 13 13 13 18 18 1 0 2		A. State Manifest Document Number CWMA 431782		
6. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		7. US EPA ID Number IP IR ID 10 10 17 10 16 13 16 16		B. State Generator's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number IP IR IT 10 19 10 15 15 19 13 16 10		C. State Transporter's ID		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		D. Transporter's Phone 833-5985		
				E. State Transporter's ID		
				F. Transporter's Phone 833-5521		
				G. State Facility's ID		
				H. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol
a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J=24982		No. Type		Quantity		Waste No.
b. CWM Profile Number		2 0 B A		2 0		M F006
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		a. D 81 c.				
		b. d.				
15. Special Handling Instructions and Additional Information						
TRAILER # YCEU 400-040-4						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name		Signature		Month Day Year		
LUIS A. URETA / Angel Serrano		[Signature]		1 2 0 8 8 8		
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Printed/Typed Name		Signature		Month Day Year		
Ruben Borrero		[Signature]		1 2 0 8 8 8		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.						
Printed/Typed Name		Signature		Month Day Year		

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)		21. Generator's US EPA ID No. P R D 0 0 0 7 0 6 3 3 3	Manifest Document No. 8 8 1 0 2	22. Page 2	Information in the shaded areas is not required by Federal law.	
23. Generator's Name DIGITAL EQUIPMENT CORP. ROAD 368 Km 2.4 SABANA GRANDE, PR 00747 TEL. (809) 892-1946				L. State Manifest Document Number CWMA 431782		
24. Transporter Company Name 3 CHEMICAL WASTE MANAGEMNT		25. US EPA ID Number A I D 0 9 9 2 0 2 6 8 1		M. State Generator's ID		
26. Transporter Company Name		27. US EPA ID Number		N. State Transporter's ID		
				O. Transporter's Phone		
				P. State Transporter's ID		
				Q. Transporter's Phone		
28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				29. Containers	30. Total Quantity	31. Unit Vol
				No.	Type	R. Waste No.
a.						
CWM Profile Number						
b.						
CWM Profile Number						
c.						
CWM Profile Number						
d.						
CWM Profile Number						
e.						
CWM Profile Number						
f.						
CWM Profile Number						
g.						
CWM Profile Number						
h.						
CWM Profile Number						
i.						
CWM Profile Number						
S. Additional Descriptions for Materials Listed Above				T. Handling Codes for Wastes Listed Above		
				a.	d.	g.
				b.	e.	h.
				c.	f.	i.
32. Special Handling Instructions and Additional Information TRAILER # YCEU 400-040-4						
33. Transporter Acknowledgement of Receipt of Materials						Date
Printed/Typed Name				Signature		Month Day Year
34. Transporter Acknowledgement or Receipt of Materials						Date



Environmental
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COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

2

Please print or type (Form designed for use on elite (12-pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No Manifest Document No		2 Page 1 of 1		Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00753		PRD000706B33188274		A State Manifest Document Number N/A		B State Generator's ID	
4 Generator's Phone (809) 892-1946		6 US EPA ID Number		C State Transporter's ID 19-14374-R		D Transporter's Phone 836-2058	
5 Transporter 1 Company Name PROTECO		PRD091018622		E State Transporter's ID		F Transporter's Phone	
7 Transporter 2 Company Name		8 US EPA ID Number		G State Facility's ID		H Facility's Phone (809) 836-2058	
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico		10 US EPA ID Number PRD091018622		12 Containers No Type		13 Total Quantity	14 Unit Wt/Vol
11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) a RQ, Hazardous Waste Solid, n.o.s (F006) ORM-E NA 9189 PROTECO Profile Number P 2022		020		CM		00020	BT (F006)
b PROTECO Profile Number							
c PROTECO Profile Number							
d PROTECO Profile Number							
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL XXXXXX				K. Handling Codes for Wastes Listed Above a. S01 c. b. d.			
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE from 12-2-88 to 1-18-89 Picked up by Orlando Gonzalez Trucking 1-19-89 Van ID# SCXU-404808-0							
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed Typed Name LUIS URETA				Signature <i>[Signature]</i>		Month Day Year 	
17 Transporter 1 Acknowledgement of Receipt of Materials Printed Typed Name Francisco Sanchez				Signature <i>[Signature]</i>		Month Day Year 12/12/88	
18 Transporter 2 Acknowledgement of Receipt of Materials Printed Typed Name Francisco Sanchez				Signature <i>[Signature]</i>		Month Day Year 12/14/88	
19 Discrepancy Indication Space							

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0435



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12 pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 2		Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA GRANDE, PR, 00747 TEL. (809) 892-1946		6. US EPA ID Number 1P R D 0 0 0 7 0 6 3 3 3 8 9 2 0 0		A. State Manifest Document Number CWMA 431789		B. State Generator's ID			
5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		8. US EPA ID Number 1P R D 0 0 0 7 0 6 3 3 6 6		C. State Transporter's ID		D. Transporter's Phone 833-5985		E. State Transporter's ID	
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		10. US EPA ID Number 1P R T 0 9 0 5 5 9 3 6 0		F. Transporter's Phone 833-5521		G. State Facility's ID			
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		12. Containers No. Type 15 B A		13. Total Quantity 15		14. Unit Wt/Vol M		1. Waste No. F006	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J-24982		12. Containers No. Type 15 B A		13. Total Quantity 15		14. Unit Wt/Vol M		1. Waste No. F006	
b. CWM Profile Number									
c. CWM Profile Number									
d. CWM Profile Number									
J. Additional Descriptions for Materials Listed Above SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		K. Handling Codes for Wastes Listed Above a. D 81		c.					
15. Special Handling Instructions and Additional Information TRAILER # SCXU 404-808-0		Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PH-223, U.S. Environmental Protection Agency, 401 Street S.W., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.							
16. GENERATOR'S CERTIFICATION: I hereby declare that the containers are properly labeled, packaged, marked, and labeled according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		Printed/Typed Name LUIS A. URETA		Signature 		Month Day Year 1 19 89			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Carlos Borro		Signature 		Month Day Year 1 18 89					
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year					
19. Discrepancy Indication Space									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.									



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COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

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Please print or type (Form designed for use on elite (12 pitch) typewriter)

Form Approved UMB No. 2050-0039 Expires 9-30-83

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No PRD00700133388275		Manifest Document No 5		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R. 00751						A State Manifest Document Number N/A							
4 Generator's Phone 7						B State Generator's ID							
5 Transporter 1 Company Name PROTECO			6 US EPA ID Number PRD0091018622			C State Transporter's ID 19-17550-R							
7 Transporter 2 Company Name			8 US EPA ID Number			D Transporter's Phone 836-2058							
9 Designated Facility Name and Site Address PROTECO Road 385, Km. 3.5 Peñuelas, Puerto Rico			10 US EPA ID Number			E State Transporter's ID							
						F Transporter's Phone							
						G State Facility's ID							
						H Facility's Phone (809) 836-2058							
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12 Containers No Type		13 Total Quantity		14 Unit Wt Vol		15 Waste No.	
a RQ, HAZARDOUS WASTE SOLID, N.O.S. (P006) ORM-E NA9189 PROTECO Profile Number P 2022						0 2 0 0 0 0 0 2 0 1						(P006)	
b													
c													
d													
J Additional Descriptions for Materials Listed Above a. CONTAMINATED SOIL						K. Handling Codes for Wastes Listed Above a. 901 c. b. d.							
15 Special Handling Instructions and Additional Information TEMPORARY STORAGE From 12-2-88 to 1-11-89 Picked up by Orlando Gonzalez Trucking Van ID # XTRU 671-201-9													
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name LUIS URETA						Signature Edgar Lo Monte				Month Day Year 11/20/2188			
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Confesor Torres						Signature Confesor Torres				Month Day Year 11/20/2188			
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Ramon Colon						Signature Ramon Colon				Month Day Year 10/11/2189			
19 Discrepancy Indication Space													
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19 Printed/Typed Name Signature Month Day Year													

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0435

GENERATOR

TRANSPORTER

FACILITY



HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-003B. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4		4. Generator's Phone SABANA GRANDE, PR, 00747 TEL. (809) 892-1946		A. State Manifest Document Number CWMA 431785		
5. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		6. US EPA ID Number P R D 1 0 1 0 1 7 1 0 6 1 3 1 8 9 0 0 1		B. State Generator's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number P R T 1 0 9 1 0 5 5 9 1 3 6 1 0		C. State Transporter's ID		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		D. Transporter's Phone 833-5085		
				E. State Transporter's ID		
				F. Transporter's Phone 833-5521		
				G. State Facility's ID		
				H. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol
a. RQ, HAZARDOUS WASTE, SOLID N.O.S. ORM-E NA-9189 CWM Profile Number J-24982		No. Type 15 B A		15		M
b. CWM Profile Number						F006
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		K. Handling Codes for Wastes Listed Above a. D 81 b. c. d.				
15. Special Handling Instructions and Additional Information TRAILER # XTRU 671-201-9						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name: LUIS A. URETA Signature: [Signature] Month Day Year: 1 1 1 8 9						
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: Orlando Gonzalez Signature: Orlando Gonzalez Month Day Year: 1 1 1 8 9						
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: [Blank] Signature: [Blank] Month Day Year: [Blank]						
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name: [Blank] Signature: [Blank] Month Day Year: [Blank]						



Environmental
Quality
Board

COMMONWEALTH OF PUERTO RICO ENVIRONMENTAL QUALITY BOARD

P.O. Box 11488, Santurce, Puerto Rico 00910

4

Please print or type (Form designed for use on elite (12 pitch) typewriter)

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No PR000070633		Manifest Document No PR 82 26		2. Page 1 of 1		Information in the shaded areas is not required by Federal law					
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION P.O. BOX 106 SABANA GRANDE, P.R.						A. State Manifest Document Number N/A							
4. Generator's Phone (809) 892-1946						B. State Generator's ID							
5. Transporter 1 Company Name PROTECO						6. US EPA ID Number PR0091018622		C. State Transporter's ID 19-12-88					
7. Transporter 2 Company Name						8. US EPA ID Number		D. Transporter's Phone 836-2058					
9. Designated Facility Name and Site Address PROTECO Road 385, Km. 35 Peñuelas, Puerto Rico						10. US EPA ID Number		E. State Transporter's ID					
								F. Transporter's Phone					
								G. State Facility's ID					
								H. Facility's Phone (809) 836-2058					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. RQ, HAZARDOUS WASTE SOLID, N.O.S. (F006) ORM-E NA9189 PROTECO Profile Number 2022						02 06 00 00 20		T				F006	
b. PROTECO Profile Number													
c. PROTECO Profile Number													
d. PROTECO Profile Number													
J. Additional Descriptions for Materials Listed Above a. Contaminated Soil						K. Handling Codes for Wastes Listed Above a. 501 c. b. d.							
15. Special Handling Instructions and Additional Information TEMPORARY STORAGE From 12-2-88 to 1-18-89 Picked up by Orlando Gonzalez Trucking 1-19-89 van # ID SCXU-403983-3													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford													
Printed/Typed Name						Signature				Month Day Year			
17. Transporter 1 Acknowledgement of Receipt of Materials						Signature				Month Day Year			
Printed/Typed Name						Signature				Month Day Year			
18. Transporter 2 Acknowledgement of Receipt of Materials						Signature				Month Day Year			
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy Indication Space RP 0109.													
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19													
Printed/Typed Name						Signature				Month Day Year			

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0438

GENERATOR

TRANSPORTER

FACILITY

HAZARDOUS WASTE MANIFEST

(As Required By The Alabama Department of Environmental Management)

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 2	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address DIGITAL EQUIPMENT CORPORATION ROAD 368 Km 2.4 SABANA GRANDE, PR, 00747		T. (809) 892-1946		A. State Manifest Document Number CWMA 431788		
4. Transporter 1 Company Name ORLANDO GONZALEZ, INC.		6. US EPA ID Number P R D 0 0 0 7 0 6 3 6 6		B. State Generator's ID		
7. Transporter 2 Company Name TRAILER MARINE TRANSPORTER		8. US EPA ID Number P R T 0 9 0 5 5 9 3 6 0		C. State Transporter's ID		
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. Emelle Facility Alabama Highway 17 at Mile Marker 163 Emelle, Alabama 35459		10. US EPA ID Number A L D 0 0 0 6 2 2 4 6 4		D. Transporter's Phone 833-5985		
				E. State Transporter's ID		
				F. Transporter's Phone 833-5521		
				G. State Facility's ID		
				H. Facility's Phone 205/652-9721		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ, HAZARDOUS WASTE, SOLID NO.S ORM-E NA-9189 CWM Profile Number J-24982 ^H		No. Type				
b. CWM Profile Number		15 B A		15	M	F006
c. CWM Profile Number						
d. CWM Profile Number						
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above				
SOIL CONTAMINATED WITH METAL HYDROXIDE SLUDGE		a. D 81 c.				
15. Special Handling Instructions and Additional Information TRAILER # SCXU 403-983-3		Public reporting burden for this collection of information is estimated to average: 37 minutes for generators, 15 minutes for transporters, and 10 minutes for treatment, storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing the form. Send comments regarding the burden estimate, including suggestions for reducing this burden, to: Chief, Information Policy Branch, PM-223, U.S. Environmental Protection Agency, 401 Street S.W., Washington, DC 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.				
16. GENERATOR'S CERTIFICATION: I hereby declare that the co proper shipping name and are classified, packed, marked, and la according to applicable international and national government re If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.		Printed/Typed Name LUIS A. URETA				
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Month Day Year 1 18 89		
Printed/Typed Name Carlos Barreno		Signature		Month Day Year 1 18 89		
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Month Day Year		
Printed/Typed Name		Signature		Month Day Year		
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name						
Signature						

Exhibit #2

EAB inspection report

October 15, 1988

MEMORANDUM

TO : Mr. Peter L. Del Valle
Director
Radio Pollution Control
Area

FROM : Mr. Carlos R. Martinez
Acting Director
Narcotics and Dangerous
Drugs Division
William D. Reid
Acting Chief
Inspection, Monitoring and
Surveillance Section

SUBJECT : Francisco R. Bustillo
Environmental Specialist

REFERENCE : Protección Técnica Ecológica
Peñuelas, Puerto Rico
PRD 091018622

The above mentioned facility was visited on September 1 and 2, 1988. During the visit a full RCRA TSL facility inspection was performed.

Attached, please find the following documents in regard to this inspection:

- Inspection Form
- Referral to EPA

A copy of this report should be submitted to EPA Region II, since this facility is under EPA enforcement action.

/s/

ENCLOSURE

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND OPERATIONS

Protección Técnica Ecológica (PROTECO) is a commercial TLE Facility. It is located at Peñuelas, Puerto Rico. On September 1 and 2, 1988 an inspection was performed to the facility.

Management of hazardous wastes at PROTECO began before 1980. The following are the units used to treat, store or dispose the hazardous wastes received from Generators in the island:

- Containers storage area
- Tank storage area
- Containers landfill
- Neutralization impoundments
- Oil lagoon
- Land treatment area

As result of an agreement with EPA and EQB the only unit in use is the containers storage area. For all other units PROTECO will have to submit Closure Plans in order to comply with a Consent Degree granted by the US Department of Justice.

At present, the wastes received by PROTECO are containerized wastes which are stored in the drum storage area, and non-hazardous wastes from waste water treatment facilities that are placed in a non-hazardous waste landfill.

The majority of PROTECO's customers are small quantity generators (SQG). Prior to acceptance of any hazardous waste the Generators (including SQG's) are required to test each waste stream to be stored, at least, for the four hazardous wastes characteristics.

The received wastes are not chemically analyzed by PROTECO in order to determine if they match the specifications contained in the accompanying manifests. The only parameters tested by PROTECO's personnel on each incoming load are pH, flashpoint, viscosity, water content, cyanides and sulfides.

At the time of the visit I found that the dikes surrounding the drum storage areas and the dikes that separates the corrosive wastes from flammables wastes are not in good conditions. An advise was given to the person in charge of the

site operations, engineer Laracuente, to repair those earth ditches.

Another finding was, that PROTECO has received a lot of trailer vans from Digital of Sabana Grande containing contaminated soil (POB waste), eight (8) of them are stored within the premises of the drum storage area (no. 4 on the attached diagram), nine (9) trailers are stored over the Immobilization area (no. 10 on the attached diagram). According to Miss. Hernandez this will be a temporary storage area because the trailers are going to be sent to a disposal facility in the states during the months of September and October.

In relation to the Land Disposal Restrictions stated in 40 CFR Part 266, it was found that PROTECO stores Land Banned wastes for more than one year, in violation of 40 CFR Part 266.30. According to the logs kept at the facility, some of the shipments stored at the site for more than one year are:

Date received/ stored	Company	Waste No.	Manifest No.	Quantity
3-11-86	Information Magnetics	D010- F002	00002	275 g.
4-6-86	Davis & Geck	F003	86-06	266 p.
5-6-86	Emerson (Dorado)	F001	00003	440 g.
6-20-86	Davis & Geck	F003	00001	130 p.
6-20-86	Davis & Geck	F003	00001	2000 p.
10-9-86	Emerson (Dorado)	F001	00006	27 g.
10-9-86	Emerson (Dorado)	F003	00006	55 g.
<u>11-25-86</u>	Information Magnetics	F003	2-86	16 g.
2-6-87	Lutron	F001	00001	385 g.

P.L.B./sec.

CONCLUSIONS AND RECOMMENDATIONS

At the time of the inspection it was found that Protección Técnica Ecológica was not in compliance with all the state and federal regulation requirements.

The following is a list of violations found during the inspection:

1- 40 CFR 265.177 (c) and RCHNHSW Rule 812 D (3) (b) state that a storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, must be separated from the other materials by means of a dike, berm, wall or other device. CO

The wastes stored in containers by PROTECO are separated by waste type by means of earth dikes. Those dikes were found in bad conditions (deteriorated) at the time of the inspection. Therefore the company is in violation of this rule

2- Nine (9) trailers containing soil contaminated with F006 waste from Digital of Sabana Grande are stored in a not designated storage area. This area was designated and used as an Immobilization Area (see no. 16 in the attached facility diagram). At present, this Immobilization Area is inactive. This is a change in the storage process that was not notified (a revised Part A should be submitted to notify the change along with a justification), and it is a violation of 40 CFR 270.72 and RCHNHSW Rule 916 C. NW/CO

3- 40 CFR 265.52 and Rule 207 of the RCHNHSW describe the Contents of the Contingency Plan that must be kept at the facility. One of the requirements include a list of the emergency coordinators, and this list must be kept up to date. At the time of the inspection the list of emergency coordinators included in the facility's contingency plan was not up dated. Therefore the facility is in violation of this rule. CO

4- 40 CFR 265.31 and Rule 810 (B) of RCHNHSW requires that facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment.

At the time of the inspection, it was discovered that a group of containers are ~~stored in direct sunlight and do not have a continuous base, impervious to the stored waste.~~ There fore, facility is in violation of this section. located in the center of the storage which is outside the building.
 makes

5- 40 265.177 and Rule 812 (B) (4) of RCHNHSW states that the owner or operator storing hazardous waste containers shall provide sufficient confinement structures to contain leakage or spills within the designated storage area, including, but not limited to, dikes, berms or trenches. CO

At the time of the inspection, there were no dikes or berms to contain leakage or spills within a group of containers stored at the containers storage area. Therefore, facility is in violation of this section.

6- Rule 812 (B) (1) of RCHNHSW states that the hazardous waste facilities that store containers of hazardous waste must have a continuous base which is constructed so that any surface run off or spill can be contained until the spilled waste can be removed for either treatment or final disposal. At the time of the inspection all the containers were stored directly over soil. CO

7- Violations to Land Disposal Restrictions:

- a) PROTECO's waste analysis plan has not been revised to include the test required to be performed to the waste subject to restrictions and the frequency of those testings (40 CFR 265.13). Mes
- b) Storage of wastes subject to restrictions for more than one year (40 CFR 268.50).

Since this facility is under EPA Region II enforcement action, is recommended to send a copy of this report to that office for the pertinent action.

PMB/sec

PROTECC

SITE MAP LEGEND

<u>Numerical Designated</u>	<u>Unit Description</u>
1.....	Landfill, pre-RCRA drum burial
2.....	Landfill, pre-RCRA drum burial
3.....	Landfill, pre-RCRA drum burial
4.....	Drum storage area (active)
5.....	Landfill, pre-RCRA drum burial
6.....	Sanitary landfill
7.....	Lagoon, corrosive waste
8.....	Landfill, pre-RCRA drum burial
9.....	Lagoon, oil
10.....	Immobilization area (inactive)
11.....	Immobilization area (inactive)
12.....	Land application area (active)
13.....	Lagoon, rainwater (active)
14.....	Land application, non-hazardous (active)
15.....	Tank storage area (active)
16.....	Immobilization area

RCRA INSPECTION REPORT

Report prepared for:

Generator ☐

Transporter ☐

H.M. (TSD) Facility ☒

Copy of Report sent to: _____ Facility ☒ EPA-Region 11

Facility Name: Protección Tóxica Ecológica (PROTECO)

Local Address: Road 385, Km 3.5, Bo. Jallaboa, Peñuelas

Postal Address: Firm Delivery (phone no. 836-2123)

Ponce, P.R. Zip Code 00724

E.P.A. ID # PRD 091018622

Date of Inspection: September 1-2, 1988

Time In: 8:30 Time Out: 4:30

Photos Taken: ☐ YES ☒ NO

If yes, how many? _____

Samples Taken: ☐ YES ☒ NO No. of Samples _____

Participating Personnel

E.Q.B. or E.P.A. Personnel: Priscilla Bestard

Facility Personnel: Marta Hernández, Chemist

Report Prepared by: (Name) Priscilla Bestard

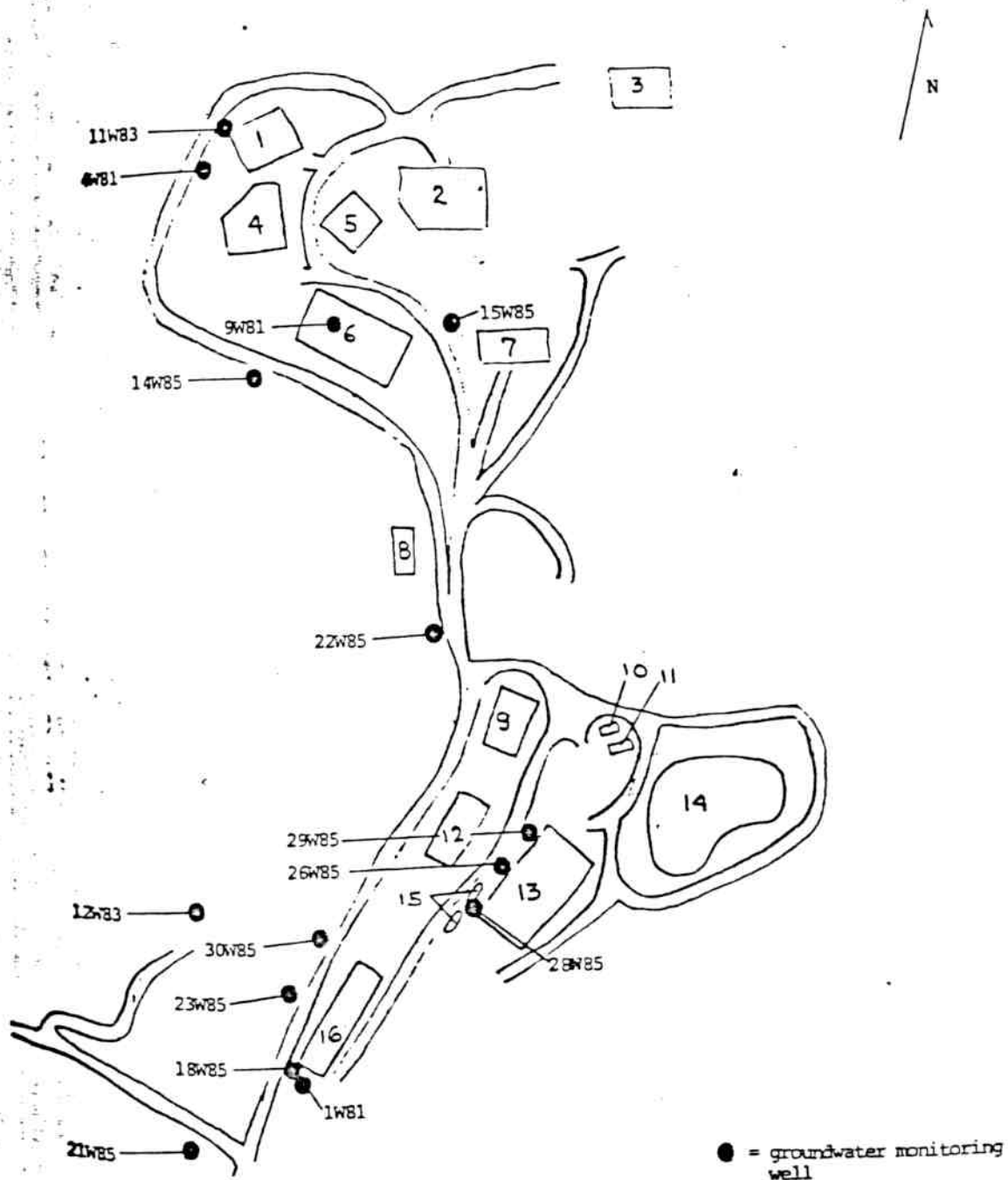
Agency: Environmental Quality Board

Telephone Number: (809) 722-6437

Approved for the Director by: _____

/sec

PROTECO
SITE MAP



HAZARDOUS WASTE FACILITY STANDARDS
(40 CFR Part 265 and Parts 803 and 820 of the RCRA/HSW)

265.13 (a)/ 807 I - Waste Analysis

	YES	NO	N/A
Company maintains a detailed chemical and physical analysis of a representative sample of the waste or each waste.	<u>✓</u>	<u>—</u>	<u>—</u>
	<u>—</u>	<u>—</u>	<u>—</u>

The waste(s) handled at the facility change
Check only one:

Change day to day ✓

Week to week —

Years or quarters —

Therefore:

Check only one:

Waste characteristic vary ✓

All waste(s) are basically the same —

Co. treat all waste(s) as hazardous —

265.13(b)/ 807 I (5) Waste Analysis Plan

Company maintains a written Waste Analysis Plan (WAP) at the facility. ✓

If no explain:

WAP contains the following:

1. Proper parameters

Specify: pH, flash point, free liquids, cyanides, sulfides

2. Proper test methods

Specify: Test methods for evaluating solid waste - SW 846

YES ☒ NO ☐ N/A ☐

3. Proper sampling methods

Specify: "Test methods for evaluating solid waste" - SW 846

☒ ☐ ☐

4. Review or Repeat analysis

Frequency: every shipment received on tank trucks and vacuum trucks
and 10% of containers for each specific waste in
each shipment.

265.13 (b)(5)/ 807 I 6 For off-site facilities

YES ☒ NO ☐ N/A ☐

For off-site facilities the WAP contain the waste analysis that hazardous waste generators have agreed to supply

☒ ☐ ☐

Also contain the procedures which will be used to identify changes in waste stream characteristics

☒ ☐ ☐

Does the hazardous waste come to this facility from an outside source? If yes, list the name(s) of generators.

☒ ☐ ☐

Hazardous waste generators in the island

If waste comes from an outside source, are there procedures in the WAP to insure that waste received conforms to the accompanying manifest?

☒ ☐ ☐

The WAP describe:

1) procedures used to determine the identity of each shipment

☒ ☐ ☐

2) sampling method used to obtain representative sample of the waste to be identified.

☒ ☐ ☐

Comments: _____

265.14/ 803D Security

	YES	NO	N/A
The facility have:			
1) 24 hour surveillance system	<u>✓</u>	___	___
Check one:			
television monitoring			
surveillance guards <u>✓</u>			
2) artificial or natural barrier <i>cyclone fence</i>	<u>✓</u>	___	___
3) Are there signs with the legend "Danger - Unauthorized Personnel Keep Out" and "Peligro - Prohibido el paso de personal no autorizado" posted at each entrance to the facility.	<u>✓</u>	___	___

If no, explain what measures are taken
for security.

265.15(a)/ 803-F General Inspection Requirements

	YES	NO	N/A
Has the owner or operator developed and follow a written schedule of inspecting?	<u>✓</u>	___	___
monitoring equipment	<u>✓</u>	___	___
safety equipment	<u>✓</u>	___	___
emergency equipment	<u>✓</u>	___	___
security devices	<u>✓</u>	___	___

YES NO N/A

operations and struct equip.

☒ ☐ ☐

.This written inspection schedule (Plan)
is kept at the facility.

☒ ☐ ☐

.The schedule identifies:

1) types of problems to be looked for
during the inspection

☒ ☐ ☐

Specify: Check for leaks, improper labels, deteriorated
drums, etc.

2) frequency of inspection:

a) daily inspections (unloading)

☒ ☐ ☐

b) weekly container inspections

☒ ☐ ☐

c) weekly tank inspections

☒ ☐ ☐

d) weekly surface imp. insp.

☒ ☐ ☐

e) daily incinerator inspections

☐ ☐ ☒

f) daily thermal treat inspections

☐ ☐ ☒

g) daily chem./phys./bio inspections

☐ ☐ ☒

3) malfunctions

☒ ☐ ☐

How remedied:

Explain: Remedial actions are established on the facility's
Contingency Plan.

Does the owner/operator record inspections
in a log?

☒ ☐ ☐

.These records are kept for at least three
(3) years from the date of inspection.

☒ ☐ ☐

YES NO N/A

Inspection log include:

- | | | | |
|--|----------|------------|------------|
| 1) date of inspection | <u>✓</u> | <u> </u> | <u> </u> |
| 2) time | <u>✓</u> | <u> </u> | <u> </u> |
| 3) name of the inspector | <u>✓</u> | <u> </u> | <u> </u> |
| 4) observations made | <u>✓</u> | <u> </u> | <u> </u> |
| 5) date and nature of remedial actions | <u>✓</u> | <u> </u> | <u> </u> |

Comments: Company is in compliance with this
section.

265.16/R 808 - Personnel Training Records

A. Facility personnel have successfully completed a program of training since six months after the date of their employment: ✓

B. Trainer's Name and Title: Mr. Juan Enrique Hegon,
Compliance Officer

Trainer's Qualifications: He has attended hazardous waste
related seminars and has worked as environmental coordinator for
over 5 years

C. Description of Training: RCRA Regulations, Personnel
protective equipment and safety, Emergency Response,
Waste Analysis Plan, Transportation and storage of wastes.

D. Records of Training:

Job title for each position	<u>✓</u>	<u> </u>
Name of employee filling each job	<u>✓</u>	<u> </u>

	YES	NO
Job descriptions for each position	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Description of the type and amount of both introductory and continuing training	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	YES	NO
E. Training records on all current employees are kept until closure and for former employees are kept for at least three (3) years.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
F. Annual review	<input checked="" type="checkbox"/>	<input type="checkbox"/>

COMMENTS: The last training was given on September 4, 1987.
The training for new employees was given on
April 8, 1988.

265.17 General Requirements for Ignitable, Reactive or Incompatible Wastes

	YES	NO	N/A
HW handled at the facility are ignitable incompatible, and reactive	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If no, continue to the next section			
If yes:			
1) Adequate handling procedures (to prevent leakage, spilling and container rupture)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) "No Smoking" signs are placed conspicuously:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Separation from sources of ignition or reaction is provided (Regs. state more than 50 feet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Confinement or smoking and open flame to specially designated locations is established. (Check "No Smoking Signs")	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Any Leaking or Badly Damaged Containers (eg. bulging or heat)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Comments: Company is in compliance with
this section.

Subpart C - 265.30/R 810 - Preparedness and Prevention

	YES	NO
A. Required Equipment:		
1) Internal comm/alarm system	<u>✓</u>	<u> </u>
2) Telephone/2 way radio	<u>✓</u>	<u> </u>
3) Portable Fire Control Equipment	<u>✓</u>	<u> </u>
4) Adequate Water/Pressure (Fire Control)	<u>✓</u>	<u> </u>
5) Spill Control and decontamination equipment	<u>✓</u>	<u> </u>
B. Equipment Test Result	<u>✓</u>	<u> </u>
C. Access to comm/alarm system: Explain:	<u>✓</u>	<u> </u>
<u>Adequate. Supervisor use a mobile radio</u> <u>unit. They also have air blast horns as</u> <u>an internal alarm.</u>		
D. Adequate Aisle Space If no explain:	<u>✓</u>	<u> </u>
<u> </u>		
<u> </u>		
<u> </u>		
E. Local Authorities Arrangements (Evidence)	<u>✓</u>	<u> </u>

COMMENTS:

Subpart D 265.50/R 207-Contingency Plan (CP) and Emergency Procedures

	YES	NO
A. Plan on Site	<input checked="" type="checkbox"/>	<input type="checkbox"/>
B. Was Emergency Plan Followed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
C. Content of Plan:		
1) Description of actions the fac. personnel shall take in response to emergencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) SPCC Plan/40 CFR 112 or Part 1510 Did the owner/operator amend this plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3) Local Authority Arrangements	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) Identify Emergency Coordinator	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(The plan must list names, addresses, and phone numbers of all persons qualified to act as emergency coordinator and this list must be kept up to date)	<input type="checkbox"/>	<input checked="" type="checkbox"/> + <i>for comment</i>
5) List of emergency equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>
(Is the list kept up-to-date? Does plan include the location and physical description of each item?)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6) Evacuation Plan (signals to be used to begin evacuation, evacuation routes or alternative)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

YLS NO

- D. Copies of Contingency Plan are maintained at the facility ☒ ☐
- E. CP has been submitted to local authorities ☒ ☐
- F. Has any Emergency occurred? ☐ ☒

COMMENTS:

Contingency Plan needs to be updated the list of the emergency coordinator is not updated.

Subpart E - 265.71/504 D (1) - Manifest system Operation (for off-site facilities only)

- | | YES | NO | N/A |
|---|-------------------------------------|--------------------------|--------------------------|
| Operator sign, date, and retain copy of each manifest that accompanies each shipment onto the site | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the o/o has a procedure which will be used to inspect and if necessary analyze each shipment of HW received at the facility to ensure that it matches the identity of the waste designated on the accompanying manifest? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Has the operator found discrepancies in manifest and waste loads?
If yes, what actions were taken by the off-site facility to reconcile the discrepancy with the waste generator or transporter | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Waste has been returned to generator.

- The operator accept wastes at the facility that were not accompanied by a manifest. ☐ ☒ ☐
- If yes, what actions were taken by the operator to obtain information on the generator who sent the waste.

265.73/ 502 C Operating Record

The operator maintain a written operating record at the facility.

✓ — —

This record includes:

1) description of the waste

✓ — —

2) quantity

✓ — —

3) method of treatment, storage or disposal

✓ — —

4) date of treatment, storage or disposal

✓ — —

5) location of the waste

✓ — —

6) final disposition of all wastes

✓ — —

7) records and results of waste analysis

✓ — —

8) records and results of inspections

✓ — —

9) closure cost estimates and post closure cost (if apply)

✓ — —

Comments:

Company keeps a daily operating log to record
the quantity and type of all hazardous waste that
is created, stored or disposed at the facility.
PRUTECO is in compliance with this section.

262.20/703 - Manifest Requirements

A. How many shipments off site since Nov. 19, 1980, have been made:-Describe also, the approximate size of an average shipment made on a monthly basis:

NA

B. Check the most recent manifests, for:

	YES	NO
a) Generator's ID number	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Document Number	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Generator's address and phone number	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Transporter's Name and ID Number	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Date of shipment and signatures	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Waste shipping name (DOT)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Waste hazard class (DOT)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h) Waste quantity or volume	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) Waste No. EPA	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Type and number of containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>
k) Designated TSD facility (name and ID number)(may specify an alternate facility)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
l) Handling Codes For Wastes	<input checked="" type="checkbox"/>	<input type="checkbox"/>

C. Check Emergency Information on Manifests:

1) Immediate response information	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2) Special handling instructions	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3) Emergency contact (phone number)

YES

NO

D. Check for Certification Statements: Signed

☒

☐

E. Check if exception reports been submitted to the EPA and EQB covering any shipment made more than 30 days ago.

☐ ☒ N/A

COMMENTS:

All the revised manifest contained the required
information. PROTECO provides the generators
with assistance in filling the document.
Company is in compliance with this section.

265.74/ 505 B, C, D Availability, Retention and Disposition of Records

All records, including plans are available
at all reasonable times for inspection.

✓ —

Comments:

All documents were available for inspection.
Company complies with this section.

265.75/503 A Biennial Report

Has the owner/operator submitted the
biennial report by March 1 of each even
numbered year?

✓ —

265.76 Unmanifested Waste Report (for off-site facilities only)

Facility accepts for treatment, storage, or
disposal any hazardous waste from out-site
source without an accompanying manifest.

— ✓

If yes, has the owner or operator prepared
and submitted a copy of a report to the
Regional Administrator within fifteen (15)
days after receiving the waste.

— N/A

Comments:

Subpart F - 265.90/ R 804 Groundwater Monitoring

YES

NO

(Applies only to: surface impoundments, landfills, land disposal facilities)

—

—

The owner/operator has a groundwater monitoring plan capable of determining the facility's impact on the quality of the ground water. If no, explain:

✓

—

Capability of GWM system is under EPA and EGIS evaluation.

There are 28 monitoring wells installed at the facility.

—

—

The depth to groundwater is _____
The depth of the monitoring wells are _____

—

—

Groundwater monitoring system is capable of yielding groundwater samples for analysis. If no, explain

✓

—

Monitoring wells are installed hydraulically upgradient. Specify how many and the depth of each.

*one upgradient well
(22 - W-85)*

—

Monitoring wells are installed hydraulically down gradient. Specify how many and the depth of each

*twenty seven
downgradient*

—

YES NO

Owner/operator has a groundwater sampling and analysis plan.

☒

☐

The plan include procedures and techniques for:

- 1- sample collection
- 2- sample preservation and shipment
- 3- analytical procedures
- 4- chain of custody

☒

☒

☒

☒

☐

☐

☐

☐

The owner/operator has prepared an outline of a groundwater quality assessment program.

☐

☐

Comments:

Since GWM system is under evaluation, no determination can be made of whether is adequate or not.

Subpart G - 265.112/ 805 A - Closure Plan

Facility has a written closure plan and keep a copy and its revisions at the facility.

☒

☐

This plan include:

1) description of how and when the facility will be partially closed (if applicable) and ultimately closed.

☒

☐

2) maximum extent of the operation which will be unclosed during the life of the facility

☒

☐

	YES	NO
3) an estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4) a description of the steps needed to decontaminate facility equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5) a schedule for final closure	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6) final disposition of all wastes	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Continue to the Closure Plans Checklist

Comments: Closure Plan is under evaluation of EPA
as part of the ^{PROTECO} Part B Permit Application.
Closure costs estimated by PROTECO's personnel are
\$ 2,099,400.00, Contingency closure cost is \$3,120,200.00

265.118/ 805 B - Post Closure Plan

Facility has a written post-closure plan kept at the facility ☒ ☐

This plan include and identifies: ☒ ☐

1) Activities which will be carried on after closure and frequency of these activities.

2) A description of the planned ground-water monitoring activities ☒ ☐

3) The integrity of the cap and final cover or other containment structures where applicable. ☒ ☐

4) Describe the function of the facility monitoring equipment ☒ ☐

5) The name, address and phone number of a person or office to contact about the disposal facility during the post-closure period. ☒ ☐

6) Written estimate of the cost of post-closure for the facility. If yes, what is it?

Post closure cost for 1 yr \$48,600.00
 " " " for 30 yr \$488,500.00

Subpart H - 265.140/R 808 - Financial Requirements

YES

NO

Does the owner/operator has submitted the documentation required in this section to ECB and/or EPA for evaluation.

✓
Note: Financial documents for 1987 and 1988 have not been submitted to ECB office.

Subpart I - 265.170 - 265.177/R 812 - Containers

A. Type of Containers used: (size, type, quantity and nature of waste) e.g. 12 fifty five gallon drums of waste acetone.

There are 665 drums (55 gallon each) stored at the facility's drum storage area. There is adequate aisle space between rows of drums. All drums were closed, labeled and in good conditions. No leaking or corroded drums were observed.

B. Condition of Containers (How many)

- | | | |
|---|------------------------|----------|
| 1) Leaks | <u>—</u> | <u>✓</u> |
| 2) Ruptures | <u>—</u> | <u>✓</u> |
| 3) Corrosion | <u>—</u> | <u>✓</u> |
| 4) Closed (Except on Use) | <u>✓</u> | <u>—</u> |
| 5) Impermeable Base | <u>—</u> | <u>✓</u> |
| 6) Secondary Containment | <u>✓</u> (earth dikes) | <u>—</u> |
| 7) Evident Spills | <u>✓</u> | <u>—</u> |
| 8) Heat Pressure | <u>✓</u> | <u>—</u> |
| 9) 50 ft. Buffer Zone (Ignitable or Reactive Waste Only) | <u>✓</u> | <u>—</u> |
| 10) Incompatible Material Segregated in different containers, not placed in unwashed container, artificial barrier) | <u>✓</u> | <u>—</u> |
| 11) Labels visible for easy identification | <u>✓</u> | <u>—</u> |

Note: Earth dikes were not in good conditions

C. Storage Area Inspected Weekly

✓ —

Comments:

There were 69 containers stored over the soil without any secondary containment. They also do not have any overhead covering to protect them from weathering. Therefore company is in violation of this section.

Subpart J - 265.190 - 265.199/R 813 - Tanks

A. Number and size of tanks containing hazardous waste:

There is only one tank and is used to store
Lindane. It has a volume of 7000 gal. At present
the tank is empty (it has about one or two
inches of Lindane in the bottom) because the Lindane
was used to make a mixture of wastes for a liver compatibility
B. Identify the waste treated/stored in each tank: test.

see above

C. Operating Requirements

- | | | |
|---|---|-----|
| 1) Leaks | — | ✓ |
| 2) Ruptures | — | ✓ |
| 3) Corrosion | — | ✓ |
| 4) -2 ft. freeboard or
Secondary Containment, or
Drainage Control System, or
Diversion Structure | ✓ | — |
| 5) Inflow Controls (if wastes is
continuously fed) | — | N/A |
| 6) Evident Discharges | — | ✓ |
| 7) Heat/Pressure | — | ✓ |

YES NO

D. Waste Analysis/Trial Test Records
(whenever tank is used to treat or
store HW different from previous waste)

— N/A

E. Tank Inspections-Check logs for:

1) Discharge Control Equipment
(waste feed cut-off, by-pass, etc.)
at least once each operating day

✓ —

2) Monitoring Equipment Data
(e.g. pressure, temperature)
at least once each operating day

— ✓

*Tank does not
have any
monitoring equipment*

3) Level of waste, at least once each
operating day

✓ —

4) Construction Materials of tank, at
least weekly

✓ —

5) Construction materials of discharge
confinement structures (e.g. dikes)
at least weekly

— ✓

*The area was
full of grass, it
does not have
a concrete dike*

F. Ignitable or reactive waste are stored
in such manner which protects them
from a source of ignition or reaction

— N/A

Explain:

G. Incompatible Wastes are being stored
separate from each other. If no,
explain:

✓ —

Comments:

Subpart K - 265.220/R 817 Surface Impoundments (pits, ponds, lagoons)

Approximate size of surface impoundment (gallons or cubic feet)

Types of waste stored and treated

There are four surface imp. at PROTECO. They are:
1- one oil lagoon
2- two neutralization lagoons
3- one storm rain water basin

Operating requirements:

- 1) two feet of freeboard
- 2) earth dikes have protective cover
- 3) waste analysis and trial tests records
- 4) evident discharges (by overtopping, dike breaching, wave action, etc.) If yes, explain:

YES NO

✓ —
— ✓
✓ —
— ✓

One of the neutralization lagoons (LF- ferric lagoon) was covered (closed) on January 5-12, 1986.

- 5) liner (s)
Specify type and thickness:

There is no synthetic liner,
leachate collection or detection
system in any of the lagoons.

YLS

NO

6) evident fire/explosions that has been occurred

If yes, explain:

✓

7) Inspections - Check logs for:

a) freeboard (each day)

✓

b) surface impoundment and surrounding (once a week)

✓

Ignitable or reactive waste placed in the surface impoundment

N/A

If yes, is the waste treated, rendered or mixed before or immediately after placement in the impoundment

N/A

Explain:

Resulting mixture of material no longer meet the definition of ignitable or reactive waste

N/A

The surface impoundment is used solely for emergencies

✓

Incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment

✓

Comments:

Subpart - L 265.250/ R 818 Waste Piles (solid or semisolid bulk wastes)

N/A

Quantity of waste piles _____
Indicate size, height and types of
wastes in piles _____

YES NO

Waste pile is protected from wind erosion
Explain type or protection _____

Leachate run-off from the waste piles
is a hazardous waste _____

If yes:

a- the pile is placed in an impermeable base _____

b- owner/operator maintains a run-on control
system _____

c- owner/operator maintains a run-off
management system _____

d- the pile is protected from precipitation
or run-on by some means _____

e- no liquids or waste containing free
liquids are placed in the pile _____

Ignitable or reactive wastes are placed
in piles _____

YES NO

If yes:

1) Addition of waste to an existing pile results in a mixture which no longer meets the definition of ignitable or reactive waste

— —

2) the waste is protected from any materials or condition that may cause it to ignite or react

— —

Piles of incompatible wastes appear to be stored separated from other wastes or materials, or protected from them by means of a dike, berm, wall or other devices

— —

— —

Subpart M - 265.270/ R 819 - Land Treatment

Hazardous wastes are placed in or on a land treatment facility.

— —

Has the owner/operator design, construct, etc. a run-on control system capable of preventing flow onto the active portions of the facility during a peak discharge from at least a 25 year storm.

— —

Has the owner/operator design, construct, etc. a run-off management system capable of collecting and controlling a water volume at least equivalent to a 24 hour, 25 year storm.

— —

Are collection and holding facilities associated with a run-on and run-off control systems emptied after storms to maintain design capacity of the system.

— — —

Does the units is managed to control wind dispersal (if apply)?

— — —

Can the waste placed in the land treatment facility be made less hazardous or no hazardous by biological degradation or chemical reaction occurring in or on the soil.

— — —

In addition to the waste analysis required by 265.13, does the owner or operator:

a) determined concentrations in the waste of

— — —

YES NO N/A

any substances that cause a waste to exhibit the EF toxicity characteristic

b) determined the concentrations of any substances which cause the waste to be listed as a hazardous waste

c) determined (if food chain crops are grown) the concentrations in the waste of each of the following constituents: arsenic, cadmium, lead and mercury

Does the owner/operator of a hazardous waste land treatment facility on which food chain crops are grown notified the Regional Administrator?

The owner/operator has a written unsaturated zone monitoring plan

This plan include the following:

1) soil monitoring using soil cores

2) soil-pore water monitoring

3) depth at which soil and soil-pore water samples are to be taken

4) number of soil and soil-pore water samples to be taken based on the variability of constituents, soil types

5) frequency and timing of soil and soil-pore water sampling based on frequency, time and rate of waste application, proximity to ground water and soil permeability

Does the owner/operator include hazardous waste application dates and rates in the operating record?

The owner/operator has developed a closure plan to address the following objectives:

1) control the migration of hazardous waste and hazardous waste constituents from the treated area

	YES	NO	N/A
2) control of the release of contaminated run-off from the facility into surface water	—	—	—
3) control of the release of airborne particulate contaminants caused by wind erosion	—	—	—
4) compliance with 265.276 concerning the growth of food-chain crops	—	—	—
Are ignitable or reactive waste treated in the land treatment facility?	—	—	—

If yes, explain:

Are incompatible wastes, or incompatible wastes and materials placed in the same land treatment area?

— — —

If yes, explain:

Subpart N - 265.302/806 Landfills

Identify the types of waste and size of the landfill

There are five drum burial landfills that are not in use.

YES

NO

General Operating Requirements

The owner/operator has designed, construct, operate and/or maintains a:

- a) run-on control system
- b) run-off control system
- c) collection and holding facilities (e.g. tanks or basins) associated with run-on, run-off control systems that are emptied after storms
- d) wind dispersal control system

— ☒

— ☒

— ☒

☒ The areas are covered with grass.

The owner/operator of a landfill maintain an operating record which includes:

- a) a map with location, dimensions and depth of each cell
- b) the contents of each cell
- c) the approximate locations of each hazardous waste type within each cell

☒ —

☒ —

— ☒

— ☒

Are untreated, ignitable, or reactive wastes placed in the landfill?

— ☒

If yes, explain:

Are incompatible wastes, or incompatible wastes and materials placed in the same hazardous waste landfill cell?

— ☒

If yes, explain:

N/A

	YES	NO
Are bulk or non-containerized liquid waste or waste containing free liquids placed in a hazardous waste landfill?	—	—
If yes:		
a) The HW landfill have a liner and a functioning leachate collection and removal system.	—	—
b) Before disposal, the liquid waste or waste containing free liquids is treated or stabilized chemically or physically.	—	—
Are containers holding liquid waste or waste containing free liquids placed in the HW landfill?	—	—
If yes, the container is one of the following:		
a) a very small container, such as an ampule	—	—
b) a container designed to hold free liquids for use other than storage such as a battery	—	—
c) a lab pack as defined in 265.316	—	—
The owner/operator use method 9095 (Paint Filter Liquids Test) to demonstrate absence or presence of free liquids in either containerized or a bulk waste.	—	—
	YES	NO
Empty containers are crushed flat, shredded, or similarly reduced in volume before it is buried beneath the surface of a landfill.	—	—
Are small containers of HW in overpacked drums (lab packs) placed in the landfill?	—	—
If yes, describe precautions taken to prevent the release of the waste		

At present the landfills are not in use.

Subpart O 265.340/ R 814 Incinerator

7/A

Describe the type of incinerator
(e.g. water wall incinerator, boiler, etc.)

List of the types and quantities of
HW incinerated.

Is residue from the incinerator a
hazardous waste?

Describe the air pollution control devices
(if any) installed in the incinerator unit.

The operating record include additional
analysis to determine types of pollutants
which might be emitted including:

- a) Heating value of the waste
- b) Halogen and sulfur content
- c) Concentrations of lead
- d) Concentrations of mercury

_____	_____
_____	_____
_____	_____
_____	_____

If no to any of the above
statements, is there justification
and documentation

_____	_____
-------	-------

YES

NO

N/A

Does it appear the incinerator is operating at steady state (normal) conditions of operation, including temperature and air flow?

—

—

The owner/operator conduct the following monitoring and inspections when incinerating HW:

- a) existing instruments related to combustion and emission controls (every 15 minutes)
- b) complete incinerator and associate equipment (pumps, valves, conveyors, pipes, etc.) (inspected daily)
- c) emergency shutdown controls and system alarms
- d) stack plume observed visually for opacity and color (at least hourly)

—

—

—

—

—

—

—

—

The incinerator have all the following instruments for measuring:

- a) wastefeed
- b) auxiliary
- c) temperature scrubber flow
- d) scrubber pH

—

—

—

—

—

—

—

—

If no, explain:

Is there open burning of hazardous waste?

—

—

List the hazardous waste burned
(only burning or detonation of explosions
is permitted)

If open burning or detonation of explosives
is taking place, describe what is the distance
from the open burning or detonation to the
property of others.

Subpart P - 265.370 - Thermal Treatment (for facilities that
thermally treat hazardous waste in devices other than enclosed
devices using controlled flame combustion, e.g. incinerator)

YES NO N/A

The owner/operator bring his thermal treatment
process to steady state (normal) conditions
before adding the waste.

The waste is analyzed before treatment to
determine:

a) heating value of the waste

b) halogen content and sulfur content
in the waste

c) concentrations in the waste of lead
and mercury, unless the owner/operator
has documented data to show the element
is not present

N/A

YES NO N/A

Does the owner/operator conduct the following monitoring and inspections: — — —

N/A

1) existing instruments related to temperature and emission control (every 15 minutes) — — —

2) stack plume (emissions) where present (must be observed visually at least hourly) — — —

3) the complete thermal treatment process and associated equipment (pump, valves, conveyors, pipes) are inspected at least daily — — —

Is there open burning or hazardous waste at the facility? — — —

List the hazardous waste burned (only burning or detonation of explosions is permitted)

If open burning or detonation of explosions is taking place, describe what is the distance from the open burning or detonation to the property of others

Does the owner/operator burn EPA Hazardous Wastes F020, F021, F022, F023, F026, or F027 under a certification granted by the Assistant Administrator for Solid Waste and Emergency Response — — —

Subpart Q - 265.400/ R 820 Chemical, Physical and Biological Treatment

N/A

(other than in tanks, surface impoundments or land treatment facilities).

Describe the treatment system at this facility and the types of wastes treated

By visual inspection, check if the treatment process show any signs of:

- | | | |
|--------------|-------|-------|
| a) leaks | _____ | _____ |
| b) ruptures | _____ | _____ |
| c) corrosion | _____ | _____ |

The process or equipment is equipped with a means to stop the inflow of continuously-fed HW.	_____	_____
--	-------	-------

The operating record include the waste analysis plan and copy of the results from each waste analysis and trial test.	_____	_____
---	-------	-------

The owner/operator conduct inspections of:

- | | | |
|--|-------|-------|
| a) discharge control and safety equipment (at least daily) | _____ | _____ |
| b) data gathered from monitoring equipment (eg. pressure and temperature gages) (at least daily) | _____ | _____ |
| c) the construction materials of the treatment process or equipment (at least weekly) | _____ | _____ |

d) the construction of materials of and
the area immediately surrounding
discharge confinement structures
(weekly)

YES

NO

—

—

N/A

Are ignitable or reactive waste fed into
the waste treatment system?

—

—

If yes, please explain:

Are incompatible wastes placed in the same
treatment process?

If yes, explain:

/sec

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Protección Técnica Ecológica

U.S. EPA I.D. No.: PRD 091018622

Street: Road 385 Km 3.5 Bo. Jallaboa

City: Peñuelas State: P.R. Zip Code: 00724

Telephone: 836-2123

Operator: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 9/1/87 Time: 10:12 AM Weather Conditions: Sunny day

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>Priscilla M. Beahm</u>	<u>EGIB</u>	<u>(809) 722-0437</u>

Facility Representatives: Miss. Martha Hernández Chemist

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	_____	_____	_____
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	<u>✓</u>	<u>✓</u>	<u>✓</u>
Disposer	_____	_____	_____

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
A. <u>F-Solvent Wastes</u>					
1. F001	_____	_____	_____✓_____	_____	_____
2. F002	_____	_____	_____✓_____	_____	_____
3. F003	_____	_____	_____✓_____	_____	_____
4. F004	_____	_____	_____✓_____	_____	_____
5. F005	_____	_____	_____✓_____	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	Store	Disp.	Trans.
Arsenic 500 mg/L	_____	_____	_____✓_____	_____	_____
Cadmium 100 mg/L	_____	_____	_____✓_____	_____	_____
Chromium VI 500 mg/L	_____	_____	_____✓_____	_____	_____
Lead 500 mg/L	_____	_____	_____✓_____	_____	_____
Mercury 20 mg/L	_____	_____	_____✓_____	_____	_____
Nickel 134 mg/L	_____	_____	_____✓_____	_____	_____
Selenium 100 mg/L	_____	_____	_____✓_____	_____	_____
Thallium 130 mg/L	_____	_____	_____✓_____	_____	_____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	<u>✓</u> _____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	<u>✓</u> _____	_____	_____
-------	-------	----------------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____

500 ppm _____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

_____ Yes _____ No ✓ NA

If yes, state reasons for mixing:

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

_____	_____	<u>✓</u> _____	_____	_____
-------	-------	----------------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

_____ Yes _____ No _____ NA

If yes, check the appropriate treatability group.

- _____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
_____ Pharmaceutical wastewater containing spent methylene chloride
_____ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

_____ Yes _____ No _____ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

_____ Yes _____ No _____ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis

1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

_____ Yes _____ No _____ NA

How was this determination made?

- Knowledge of waste

_____ Yes _____ No

If yes, note how this is adequate: _____

- TCLP

_____ Yes _____ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

_____ Yes _____ No _____ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

_____ Yes _____ No _____ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

_____ Yes _____ No _____ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes ☐ No ☐ NA

What type of absorbent is used? _____

Check the types of waste to which absorbent is added.

- ☐ Liquid hazardous waste having a pH less than or equal to 2
- ☐ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L
- ☐ Liquid hazardous waste containing metals
- ☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes ☐ No ☐ NA

If yes, note how this is adequate: _____

- Testing

☐ Yes ☐ No ☐ NA

If yes, list test method used: _____

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

☐ Yes ☐ No ☐ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

☐ Yes ☐ No ☐ NA

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

_____ Yes _____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

_____ Yes _____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) _____ Yes _____ No

Applicable treatment standards _____ Yes _____ No

Manifest number _____ Yes _____ No

Waste analysis data, if available _____ Yes _____ No

Identify off-site treatment or storage facilities: _____

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

_____ Yes _____ No

GEN

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☐ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☐ No

If yes, list types of waste treatment units and processes:

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☒ Yes ☐ No

If yes, check the appropriate regulatory status:

☒ Interim status for storage

☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

- B. Does the transporter mix, combine, or recontainerize wastes?

☒ Yes ☐ No

- C. Is the waste treated in an exempt treatment process on-site?

☐ Yes ☒ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA
 o California List ☐ Yes ☒ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

- a. What date was the waste analysis plan last revised? August 7, 1987

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: E.G. Labs, Inc.
Box 8725, San Jose, CA 95128

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Describe the frequency of sampling: every shipment received

- e. Describe procedures used to identify manifest discrepancies:

Some testing is performed at the site (identity,
color, etc.) against land disposal records

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☐ Tanks
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

Containers are marked with the haz waste label, contents is identified but not the date entering storage at the TS facility. Date entering storage is recorded in the log book.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☒ Yes ☐ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☒ No

If yes, state how: _____

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No ☒ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ☒ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ☒ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Describe frequency of testing treatment residuals:

5. Is dilution used as a substitute for treatment?

____ Yes ____ No

6. Are notifications prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ ☒ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

_____ Yes _____ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

- c. Are residues subsequently managed in another surface impoundment?

____ Yes ____ No

- d. Are residues treated prior to disposal?

____ Yes ____ No

If yes, are waste residues treated on-site or off-site?

____ On-site ____ Off-site

Identify treatment method: _____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

____ Yes ☒ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

____ Yes ____ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

____ Yes ____ No

If yes, at what frequency? _____

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

_____ Yes _____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

_____ Yes _____ No _____ NA

7. What is the volume of the restricted wastes disposed of to date?
- _____
- _____

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

_____ Yes _____ No _____ NA

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene (F003)
12%	TCE (F001)
<u>38%</u>	mineral spirits
100%	

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
------------------------------------	------------------------------------	---------------	-------------------	--

Exhibit #3

Proteco Part A Applications

12/27/85

530 Fifth Avenue, New York, N.Y. 10036-5166 (212) 840-3990

Fred C. Hart Associates, Inc.

Keener
1/85
Protec/Inc/State



December 24, 1985

Mr. Stanley Seigel
U.S. Environmental Protection Agency
Region 2
26 Federal Plaza
New York, N.Y. 10278

Re: PROTECO Part A Application

Dear Mr. Seigel:

On behalf of PROTECO, we are forwarding one signed copy of an updated Part A Application which reflects the latest management staff and current status of regulated units at the facility.

Should you have any questions, do not hesitate to call.

Very truly yours,

FRED C. HART ASSOCIATES, INC.

Gary Brown
Gary R. Brown, P.E. *(D.S.)*

GRB/dg
cc: J. Gorman
(B511)



GENERAL INFORMATION

Downloaded From: Program

Read the "General Instructions" before starting.)

EPA ID NUMBER

PRO091018622

GENERAL INSTRUCTIONS

If a preprinted label has been provided, fill it in the designated space. Review the information carefully; if any of it is incorrect, or through it and enter the correct data in appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to left of the label space lists the information that should appear), please provide it in proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete Item II, no label has been provided. Refer the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

EMERGENCY PREPAREDNESS

INSTRUCTIONS: Complete A through D to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any question, you must submit this form and the supplemental form listed in the parentheses following the question. Mark "X" in the box in the third column. If the supplemental form is not listed, if you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is not listed in the permit requirements, see Section C of the instructions. See also, Section B of the instructions for definitions of bold-faced terms.

	GENERAL INFORMATION			SPECIAL COMMENTS	MARK		
	YES	NO	PO ATTN		YES	NO	PO ATTN
1. Is this facility a primary source of emissions which results in a discharge to waters of the U.S.? (FORM 20)		X		2. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or similar animal production facility which results in a discharge to waters of the U.S.? (FORM 28)		X	
3. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 22)		X		4. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 22)		X	
5. Does or will this facility have, store or dispose of hazardous waste? (FORM 24)	X		X	6. Do you or will you inject on this facility industrial or municipal effluent below the basement stream containing, within one-quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
7. Do you or will you inject on this facility any produced water, other fluids, brine, or formation water from an operation with conventional oil or natural gas production. Inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		8. Do you or will you inject on this facility fluids for special purposes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
9. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions but which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect air listed in an attainment area? (FORM 5)		X		10. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 200 tons per year of any air pollutant regulated under the Clean Air Act and may affect air listed in an attainment area? (FORM 5)		X	

THE NAME OF FACILITY

PROTECCION TECNICA ECOLOGICA INC

THE FACILITY CONTACT

NAME & TITLE (Last, First & Middle)			PHONE (OFF CODE & NO.)		
2	RAUL GAYA	GENERAL MANAGER	809	837	221

✓ FACILITY MAIL FOR ADDRESS

1. THE STATE OF TEXAS

FIRM DELIVERY

U.S. CITY OF NEW YORK

P O N C E

VE. FACILITY LOCATION

1. NAME: _____

ROAD 385 Km 35

ALSO SEE: PAGES

CODES (4-digit, in order of priority)		A. FIRST		B. SECOND	
3	9	9	(specify)	7	8.8.9.9 (specify)
Business Service (NEC) Waste Disposal				Service (NEC) Landfill	
C. THIRD		D. FOURTH			
(specify)		(specify)			

OPERATOR INFORMATION		A. NAME		B. Is the name listed in Item VIII-A also the owner?	
ROTECCION TECNICA ECOLOGICA INC.				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

C. TYPE OF OPERATION (Enter the appropriate letter into the answer box; if "Other", specify)		D. PHONE (area code & no.)	
P (specify)		809 837 2211	

E. STREET OR P.O. BOX	
ROAD 385 Km 35	


F. CITY OR TOWN		G. STATE		H. ZIP CODE		IX. INDIAN LAND	
ENEULAS		PR		00731		Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. OTHER ENVIRONMENTAL PERMITS		D. PSD (Air Emissions from Proposed Sources)	
Y. UIC (Underground Injection of Fluids)		E. OTHER (specify)	
		R S P #5 (specify) Quality Board	
C. RCRA (Hazardous Waste)		F. OTHER (specify)	
		75-12-19-56 (specify) Puerto Rico Planning Board	

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

NATURE OF BUSINESS (provide a brief description)

Treatment, storage and disposal of hazardous and non-hazardous waste from various manufacturing plants in Puerto Rico.

CERTIFICATION (see instructions)	
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.	
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE
George J. Fernandez, President	
C. DATE SIGNED	



U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permit Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

PRD091018522

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (Place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (Place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, the describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	D07	GALLONS OR LITERS
TANK	D08	GALLONS OR LITERS
WASTE PILE	D09	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	D04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-Feet (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U

UNIT OF MEASURE	UNIT OF MEASURE CODE
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	N

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-Feet	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP									
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 4	100,000 (LB)	G		7				
2	D 8 0	4.72 (TI3)	A		8				

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE
INCLUDE DESIGN CAPACITY.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
POUNDS.....P
TONS.....T

METRIC UNIT OF MEASURE **CODE**
KILOGRAMS.....K
METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
			1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
K 0 5 4	900	P	T 0 3 D 8 0	
D 0 0 2	400	P	T 0 3 D 8 0	
D 0 0 1	100	P	T 0 3 D 8 0	

DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

Note 1: The only wastes from this list entering units LB and TI3 are from spills, spill residues and liquid decanted from the oil lagoons (LA, Unit No. 9).

EPA I.D. NO. (enter from page 1)

P	R	D	0	9	1	0	1	8	6	2	2	12	13	14	15
												16	17		

FACILITY DRAWING

existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

PHOTOGRAPHS

existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

1	8	0	1	0	5
28	29	30	31	32	33

6	6	4	1	0	3
74	75	76	77	78	79

I. FACILITY OWNER

A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

Compania Ganadera del Sur, Inc.

8	0	1	8	3	6	1	0	8
50	51	52	53	54	55	56	57	58

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

Firm Delivery

G

Ponce

PR

0	0	7	3	1
69	70	71	72	73

OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME (print or type)

Lucas P. Valdivieso

B. SIGNATURE



C. DATE SIGNED

12/13/85

OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

1. I.D. NUMBER (enter from page 1)

2 0 0 9 1 0 1 8 6 2 2 1

W DUP 2 DUP

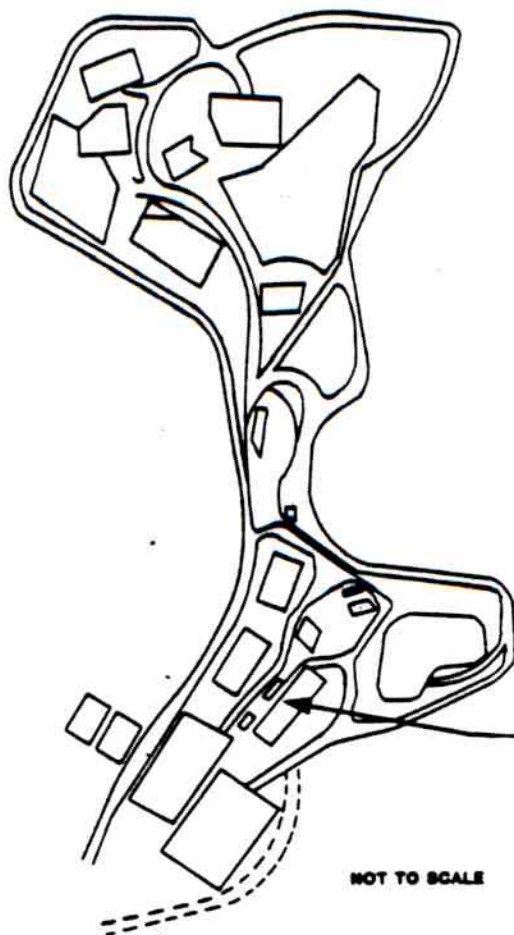
DESCRIPTION OF HAZARDOUS WASTES (continued)

A. EPA HAZARD. WASTENO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEAS- URE (enter code)	D. PROCESSES									
			1. PROCESS CODES (enter)					2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
23	24	25	26	27	28	29	30	31	32	33	34	35
0 0 0 1	130,000	K	S 0 1	S 0 4								See Note 1
0 0 0 1	100,000	K	S 0 1	S 0 4								"
0 0 0 2	2,000,000	K	S 0 1	S 0 4								"
0 0 0 2	2,000,000	K	S 0 1	T 0 1								"
0 0 0 4	100	K	S 0 1	T 0 1	D 8 0							"
0 0 0 6	300	K	S 0 1	T 0 1	D 8 0							"
0 0 0 7	50	K	S 0 1	T 0 1	D 8 0							"
0 0 0 8	950,000	K	S 0 1	T 0 1								"
0 0 0 8	80,000	K	S 0 1	T 0 1	D 8 0							"
0 0 0 9	55,000	K	S 0 1	T 0 1	D 8 0							"
0 0 1 0	200	K	S 0 1	T 0 1	D 8 0							"
0 0 1 1	10	K	S 0 1	T 0 1	D 8 0							"
0 0 1 3	290,000	K	S 0 1	T 0 1	D 8 0							"
F 0 0 1	64,000	K	S 0 1	T 0 1	D 8 0							"
F 0 0 2	17,000	K	S 0 1	T 0 1	D 8 0							"
F 0 0 3	60,000	K	S 0 1	T 0 1	D 8 0							"
F 0 0 5	31,000	K	S 0 1	T 0 1	D 8 0							"
F 0 0 6	52,000	K	S 0 1	T 0 1	D 8 0							"
K 0 6 2	2,000	K	S 0 1	T 0 1	D 8 0							"
P 1 0 5	100	K	S 0 1	T 0 1	D 8 0							"
U 0 0 2	5,000	K	S 0 1	T 0 1	D 8 0							"
U 0 1 9	5,000	K	S 0 1	T 0 1	D 8 0							"
U 0 4 4	3,000	K	S 0 1	T 0 1	D 8 0							"
U 0 8 0	4,000	K	S 0 1	T 0 1	D 8 0							"

D	0	9	1	0	1	E	6	2	2	T/A	C	1
										13	14	15

W	DUP										T/A	C	2	DUP				
													13	14	15	16	17	18

[illegible]



NOT TO SCALE

LOCATION OF
RAINWATER BASIN (LB)
PROTECO FACILITY

LAGUNA AGUA DE LLUVIA
RAIN WATER BASIN
LB



RAINWATER BASIN
(L B)
PROTECO
PENUELAS, PUERTO RICO
JULY 26, 1984

FACILITY NO 13

NO UNDERGROUND INJECTION WELLS AT FACILITY.



EXISTING FACILITY

SCALE 1:20,000



PUERTO RICO

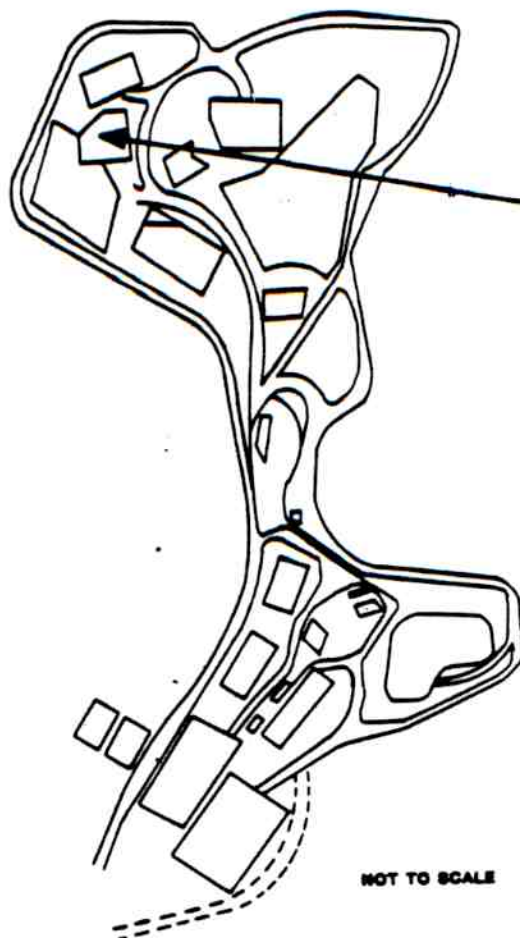
QUADRANGLE LOCATION

PEÑUELAS, P. R.
N1800-W6637 5/7.5

1972
PHOTO REVISITED 1987

PART A
LOCATION OF
SERVICIOS CARBAREON, INC.
PENUELAS, P.R.

ERED C. HART ASSOCIATES, INC.



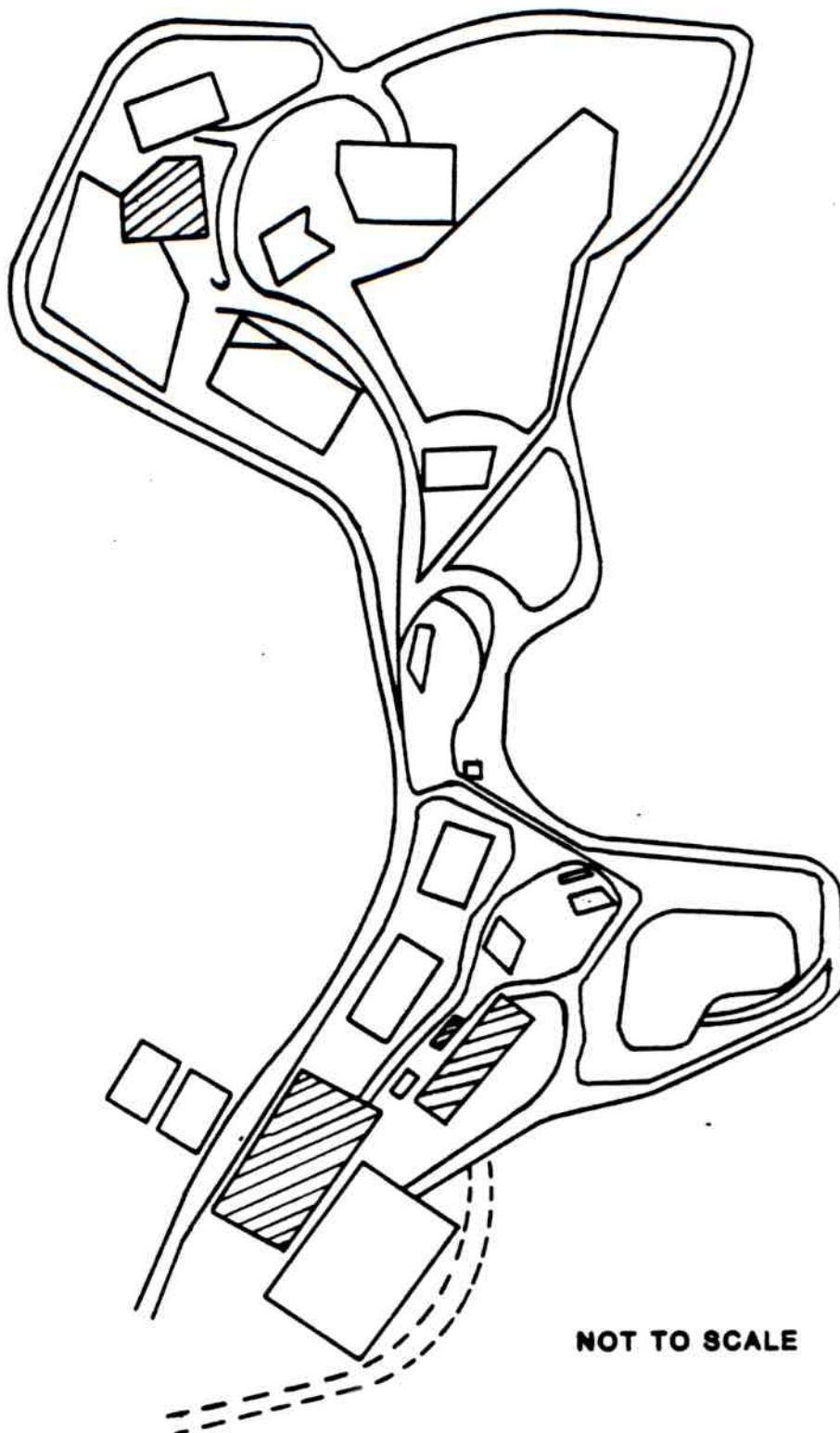
LOCATION OF DRUM
STORAGE AREA,
PROTECO FACILITY



DRUM STORAGE AREA
(D E)
PROTECO
PENUELAS, PUERTO RICO
JULY 26, 1984

FACILITY NO: 4

N



NOT TO SCALE



**REGULATED HAZARDOUS
WASTE UNITS**



**REGULATED HAZARDOUS
WASTE UNITS COVERED
IN THIS PART A APPLICATION**

**PART A
FACILITY DRAWING**

Exhibit #5
Certificate of insurance

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION AND DOES NOT CONSTITUTE AN OFFER OF INSURANCE. NO RIGHTS OR BENEFITS UNDER ANY POLICY OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR ALTER THE COVERAGE AFFORDED BY THE POLICY OR OTHER DOCUMENT.

COMPANIES AFFILIATED WITH US

COMPANY LETTER	A	El Fénix de Puerto Rico
COMPANY LETTER	B	
COMPANY LETTER	C	
COMPANY LETTER	D	
COMPANY LETTER	E	

El Fénix de Puerto Rico
(PR-1000)
P.O. Box 614, H-14, 20
San Juan, PR 00903

ALL POLICIES DESCRIBED HEREIN HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. THIS CERTIFICATE IS NOT A CONTRACT. THE POLICY OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR ALTER THE COVERAGE AFFORDED BY THE POLICY OR OTHER DOCUMENT. THIS CERTIFICATE IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF THE POLICY OR OTHER DOCUMENT.

POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YYYY)	POLICY EXPIRATION DATE (MM/DD/YYYY)	ALL LIMITS IN THOUSANDS	
			GENERAL AGGREGATE	\$ 1,000
SIP-110115	9-2-88	9-2-89	PRODUCTS COMP/OPS AGGREGATE	\$ 1,000
			PERSONAL & ADVERTISING INJURY	\$ 1,000
			EACH OCCURRENCE	\$ 1,000
			FIRE DAMAGE (ANY ONE FIRE)	\$ 50
			MEDICAL EXPENSE (PER ONE PERSON)	\$ 1
EL-0507	9-2-88	9-2-89	CSL	\$ 1,000
			BODILY INJURY (PER PERSON)	\$
			BODILY INJURY (PER ACCIDENT)	\$
			PROPERTY DAMAGE	\$
SIP-0007	9-2-88	9-2-89	EACH OCCURRENCE	\$
			STATUTORY	\$
			Comp. \$250. Ded. Coll. \$250. Ded.	

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 60 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

ARRETA & COMBAS INSURANCE AGENCY, INC.
[Signature]

Exhibit # 5

Financial assurance and
liability



Protección Técnica Ecológica

February 7, 1989

ENVIRONMENTAL PROTECTION AGENCY
REGION II
26 FEDERAL PLAZA
ROOM 1000
NEW YORK, N.Y. 10278

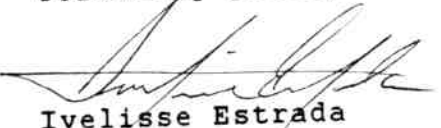
ATTN: MR. TOM MOI

Dear Mr. Moi:

Pursuant to your request this is a status report about our efforts to acquire the necessary financial assurance to cover non sudden occurrences and the Certificate of Insurance (include General Liability and Automobile Liability).

If you have any question don't hesitate to call us at 721-4382.

Cordially yours,



Ivelisse Estrada
Marketing Director

cc: Mr. Steve Gordon

Enclosure



El Fénix de Puerto Rico

COMPANIA DE SEGUROS

CERTIFICATE OF INSURANCE

This is to Certify, that policies in the name of

NAMED
INSURED
and
ADDRESS

PROTECCION TECNICA ECOLOGICA CORP. (PROTECO)
AVE. HIPODROMO #614 PDA. 20
SANTURCE, P.R. 00909

THIS CERTIFICATE OF INSURANCE NEITHER AFFIRMATIVELY NOR
NEGATIVELY AMENDS, EXTENDS OR ALTERS THE COVERAGE
AFFORDED BY ANY POLICY DESCRIBED HEREIN.

are in force at the date hereof, as follows:

KIND OF INSURANCE	POLICY NUMBER	POLICY PERIOD	LIMITS	
			Workmen's Compensation Ins. Employers' Liability Ins.	STATUTORY
WORKMEN'S COMPENSATION AND EMPLOYERS' LIABILITY		Eff. Exp.		\$
			BODILY INJURY cs1	PROPERTY DAMAGE
COMPREHENSIVE GENERAL LIABILITY	SMP-310115	Eff. 9-2-88 Exp. 9-2-89	\$ 1,000 ,000 Each occurrence \$ 1,000 ,000 Aggregate	\$ 1,000 ,000 Each occurrence \$ 1,000 ,000 Aggregate
MANUFACTURERS' AND CONTRACTORS' LIABILITY		Eff. Exp.	\$,000 Each occurrence	\$,000 Each occurrence \$,000 Aggregate
OWNERS', LANDLORDS' AND TENANTS' LIABILITY		Eff. Exp.	\$,000 Each occurrence	\$,000 Each occurrence \$,000 Aggregate†
CONTRACTUAL LIABILITY		Eff. Exp.	\$,000 Each occurrence	\$,000 Each occurrence \$,000 Aggregate
AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> Owned Automobiles <input checked="" type="checkbox"/> Hired Automobiles <input checked="" type="checkbox"/> Non-Owned Automobiles	TP-0007	Eff. 9-2-88 Exp. 9-2-88	cs1 \$ 1,000 ,000 Each person \$ 1,000 ,000 Each occurrence	\$ 1,000 ,000 Each occurrence
COMPREHENSIVE AUTO- MOBILE LIABILITY		Eff. Exp.	\$,000 Each person \$,000 Each occurrence	\$,000 Each occurrence
OTHER:		Eff. Exp.		

† Aggregate not applicable if Owners', Landlords' and Tenants' Liability Insurance excludes structural alterations, new construction and demolition.

In the event of any material change in, or cancellation of, said policies, the undersigned company will endeavor to give written notice to the party to whom this certificate is issued, but failure to give such notice shall impose no obligation nor liability upon the company.

Dated: 1-31-89

CERTIFICATE ISSUED TO:

ENVIRONMENTAL PROTECTION AGENCY

ARIETA & COMBAS INSURANCE AGENCY, INC.



El Fénix de Puerto Rico

COMPANIA DE SEGUROS

CERTIFICATE OF INSURANCE

This is to Certify, that policies in the name of

NAMED
INSURED
and
ADDRESS

PROTECCION TECNICA ECOLOGICA CORP. (PROTECO)
AVE. HIPODROMO #614 PDA. 20
SANTURCE, P.R. 00909

THIS CERTIFICATE OF INSURANCE NEITHER AFFIRMATIVELY NOR
NEGATIVELY AMENDS, EXTENDS OR ALTERS THE COVERAGE
AFFORDED BY ANY POLICY DESCRIBED HEREIN.

are in force at the date hereof, as follows:

KIND OF INSURANCE	POLICY NUMBER	POLICY PERIOD	LIMITS	
			Workmen's Compensation Ins. Employers' Liability Ins.	STATUTORY
WORKMEN'S COMPENSATION AND EMPLOYERS' LIABILITY		Eff. Exp.		\$
			BODILY INJURY cs1	PROPERTY DAMAGE
COMPREHENSIVE GENERAL LIABILITY	SMP-310115	Eff. 9-2-88 Exp. 9-2-89	\$ 1,000 ,000 Each occurrence \$ 1,000 ,000 Aggregate	\$ 1,000 ,000 Each occurrence \$ 1,000 ,000 Aggregate
MANUFACTURERS' AND CONTRACTORS' LIABILITY		Eff. Exp.	\$,000 Each occurrence	\$,000 Each occurrence \$,000 Aggregate
OWNERS', LANDLORDS' AND TENANTS' LIABILITY		Eff. Exp.	\$,000 Each occurrence	\$,000 Each occurrence \$,000 Aggregate†
CONTRACTUAL LIABILITY		Eff. Exp.	\$,000 Each occurrence	\$,000 Each occurrence \$,000 Aggregate
AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> Owned Automobiles <input checked="" type="checkbox"/> Hired Automobiles <input checked="" type="checkbox"/> Non-Owned Automobiles	TP-0007	Eff. 9-2-88 Exp. 9-2-88	cs1 \$ 1,000 ,000 Each person \$ 1,000 ,000 Each occurrence	\$ 1,000 ,000 Each occurrence
COMPREHENSIVE AUTO- MOBILE LIABILITY		Eff. Exp.	\$,000 Each person \$,000 Each occurrence	\$,000 Each occurrence
OTHER:		Eff. Exp.		

† Aggregate not applicable if Owners', Landlords' and Tenants' Liability Insurance excludes structural alterations, new construction and demolition.

In the event of any material change in, or cancellation of, said policies, the undersigned company will endeavor to give written notice to the party to whom this certificate is issued, but failure to give such notice shall impose no obligation nor liability upon the company.

Dated: 1-31-89

CERTIFICATE ISSUED TO:

ENVIRONMENTAL PROTECTION AGENCY

ARIETA & COMBAS INSURANCE AGENCY, INC.



SOUTH CONTINENTAL INSURANCE AGENCY, INC.

Tetuan 252, El Viejo San Juan / Apartado 6022, Estación Viejo San Juan, P.R. 00905

Teléfonos:

(809) 721-7600

723-1279

Teletipos:

RCA 3252570

Facsimile-723-9189

ANGELA WEYNE

Presidente

February 1, 1989

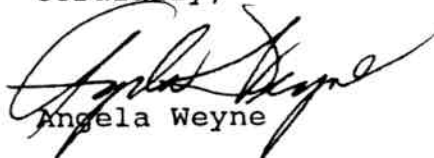
**DR. JORGE FERNANDEZ
PROTECO
Calle Hipodromo
Santurce, Puerto Rico**

PROTECO

Dear Jorge:

Enclosed please find letter from American International Insurance Company of Puerto Rico answering our inquiry as to the status of our submission.

Cordially,



Angela Weyne

AW:nb

REPRESENTANDO A:

American International Insurance Co. of P.R.
Corporación Insular de Seguros
Eagle Star Insurance Company of Puerto Rico

National Life Insurance Company
Professional Underwriters Insurance Co.
The North River Insurance Co.
Westchester Fire Insurance Co.

The Hartford Steam Boiler Inspection & Insurance Co.
The Royal Insurance Company of Puerto Rico, Inc.
United States Fire Insurance Co.
Universal Insurance Company

FACSIMILE ROUTE SHEET

PAGE 1 OF 2

ETE IN DUPLICATE, ORIGINAL TO TELEX DEPARTMENT, RETAIN DUPLICATE - TYPE OR PRINT
BY USING BLACK INK)

<i>F</i> <i>9</i>	Name of Individual <i>Angie Wayne</i>	<i>F</i> <i>R</i> <i>O</i> <i>M</i>	Name of Individual PAUL GRIMES
	Office Location (City & Country) <i>San Juan, PR</i>		Office Location (City & Country) SANTURCE, PUERTO RICO
	Company & Department <i>South Cont</i>		Company & Department AIU & AIICO/FINANCIAL LINES
	Date <i>1-31-89</i>		Signature

not write in these boxes. For use by Telex Dept.

Co. Code	Dept. Code	Time Sent	FAX No.	000950
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*Please see attached letter,
original will follow tomorrow
mornings by mail*

Angie
Mary Angie

RECEIVED
 31 ENE 1989
RECEIVED

January 31, 1989

Mrs. Angie Weyne
South Continental Insurance Agency
PO Box 6022
San Juan, Puerto Rico

Re: PROTECO EIL

Dear Angie:

I refer to our telephone conversation of last Friday.

I spoke to the pollution underwriter in charge of reviewing this account to find out the latest status. The underwriter advised me that her analysis of the additional information sent by you will be completed and a decision rendered on the acceptability of the account during the second week in February.

Angie, as soon as I hear from New York, I will advise same.

Yours sincerely,

Paul Grimes

Paul Grimes

mar

cc : Adriene Atwell
Pollution Department, New York

Exhibit # 8

hazardous waste inventory

	Waste	Waste type	# Drums
Flammable liquid N.O.S.	9/19/85 11/20/85	D001	61
Flammable liquid N.O.S.	11/20/85	D001	17
Hazardous waste Solid N.O.S.	6/20/86	F003	12
" " " "	11/85	F001, D001	8
Formalin		D001	3
Waste isopropanol	11/5/87	D001, U002	2
Hazardous waste liquid N.O.S.	9/4/85	F001,	10
Flammable liquid N.O.S.		D001, D010	4
" " "		D001, U154	2
Hazardous waste liquid N.O.S.	3/86 4/86	F001	9
Flammable liquid N.O.S.	12/20/85	K052	12
Waste Paint	4/85	D001	6
Hazardous waste liquid	9/29/87	D008, D001	2
Flammable liquid N.O.S.	7/2/87	D001, F001, D008	4
" " "	11/5/87	D001	17
" " "	12/14/87	D001	4
" " "		D001	2
Waste methanol	4/86 5/7/87 10/10/86 11/87	F003	16
Flammable liquid N.O.S.		D001	1
" " "		D001	2
Waste xylene		D001, U239	2
Flammable liquid N.O.S.		D001	1
Compound cleaning		D001	1
Flammable liquid N.O.S.		U154, U220 U112, U159	1
Waste oil N.O.S.		D001	4
Flammable liquid N.O.S.		D001	2
" " "		F001, D001	4
" " "		D001	3

ALKALINES

AND TOXICS Area:

Location	Generator Name	Waste	Waste Type	# Drums
MOCA	Information Magnetics	Chromic Acid Sludge	D002, D007	6
"	"	Corrosive Solid H.O.S.	D001, D007	8
Ponce	U.S.I. de P.R.	Hazardous waste solid H.O.S.	D008	12
Dayton Beach, Florida	Geosintec 9/25/87	" " " "	D002, D003, D001	58
Juncos	Becton Dickinson	Mercury Metallic	D008	85
Dorado	Emerson P.R.	Mercury Metallic	D007	18
Dorado	"	Hazardous waste liquid H.O.S.	F001	6
Baton Rouge LA	Ethyl Corporation	" " " "	D008	4
San Juan	Texaco P.R.	" " " "	D008	1
Various	Instruccion Publica (LAB-Packs)	" " Solid H.O.S.	D007, D008, D002, D008	14
MOCA	Information Magnetic	H2O2 mixture cont. Phenol & Met chl.	D009, E001	6
"	"	1,1,1-trichloroethane	D002	1
Santa Isabel	Corporation of Vegetables	Hazardous waste solid H.O.S.	D008, D003, P20	28
Carolina	Lederle Labs (LAB-Packs) 3/87	" liquid & solid H.O.S.	D002	3
Various	Hospitales (LAB-Packs)	" " " "	D002	4
Various	Instruccion Publica (LAB-Packs)	oxidizer	D002	3
Cerba	C.W. Caribe Inc	Hazardous waste liquid H.O.S.	D002, F001	1
Cidra	Pepsi Cola Manufacturing (LAB-Packs)	Hazardous waste liquid & solid H.O.S.	D002	1
Mayaguez	Stiefel (LAB-Packs)	Hazardous waste liquid H.O.S.	D002	1
Villalba	Latas Libbys	Lead dross	D008	6
San German	Iolab Pharmaceutical	Mercury Metallic	D007	1
San German	Iolab Pharmaceutical 11/87	Hazardous waste liq & solid H.O.S.	D002	4
Cayey	Fisher Scientific (LAB-Packs)	" " "	D002, D007	6
Rio Piedras	Centro Medico (LAB-Packs)	" " "	D002	4

Acid or Corrosives (pH \leq 6) area

Location	Generator Name	Waste	Waste Type	# Drums
Anturce	Royal Bank	corrosive liquid N.O.S.	D002	5
Mayaguez	Stiefel (LAB-PACK)	acid liquid N.O.S.	D002	1
Cariba	C.W. Caribe Inc	Acetic acid glacial	D002	1
"	" " "	Hazardous waste solid N.O.S.	D001, D002	15
Caguas	Aeroflex	" " " "	D002	1
Caguas	Fisher (LAB-PACKS)	acid liquid N.O.S.	D002, R001	7
Cidra	Pepsi Cola (LAB-PACKS)	" " "	D002	1
Mayaguez	Storage Tek	Corrosive liquid N.O.S.	D002	5
Cidra	Instrumentation Lab	acid liquid N.O.S.	D001, D002	1
Carolina	Lederle Labs (LAB-PACKS)	" " "	D002	2
Various	Hospitales (LAB-PACKS)	" " "	D002	6
Various	Instruccion Publica (LAB-PACKS)	" " "	D002	61

Flammables (reactives) area

Location	Generator Name	Waste	Waste Type	# Drums
Caguas	Aeroflex	Sodium Hydrogen Sulfide	D003	1
Caguas	"	Sodium M bisulfite	D003	1
Various	Instruccion Publica (LAB-PACKS)	Sodium Alcl	D003	1

<u>Generator Name</u>	<u>Waste type</u>	<u>manifest No.</u>	<u>Date</u>
Information Magnetic Caribe	F003, D001 - waste methanol	8703	12/4/87
West Electronics - Aguadilla	F001, D008, D001 - Flam. liquid	00001	8/4/87
Information Magnetic - Moca	F003 waste methanol	87002	8/26/87
" "	F003 ^{at yard} waste Methyl-dl	87001	4/23/87
utron - Humacao	F001 Flam. liquid	00001	2/3/87
Westinghouse - San Juan	F006 Haz. waste liquid	038	* (return to Generator on 2/6/87 - 3/13/87)
" "	F006 Haz. waste liquid	039	
Information Magnetics - Moca	F003 waste methanol	2-86	2/23/86
Emerson - Dorado	F001 Haz. waste lig.	00006	10/9/86
" "	F003 Haz. waste lig.	00006	10/9/86
D-micropette - Camaguey	F001 Haz. waste lig.	00002	6/18/86
Axis & Geck Inc - Manati	F003 Haz. waste lig.	00001	6/20/86
" "	F003 " " "	00001	6/10/86
Emerson P.R. - Dorado	F001 " " "	00003	5/6/86
Axis & Geck Inc - Manati	F003 Haz. waste solid	86-06	4/8/86
Information Magnetics - Moca	^{D010} F002 (Hazardous mixture: Phenol + Dichloromethane)	00002	3/11/86
Palmes Printing - Juncos	F003 Flam. liquid	PP0019	12/4/85
Aeroflex - Caguas	^{D007} F006 Haz. waste solid	00001	12/5/85
ecton - Dickinson - Juncos	F001 Haz. waste liquid	00003	12/6/85
Sartorius - Yauco	F001 Haz. waste liquid	00002	11/26/85
" "	F001 " " "	00001	10/18/85

Fragment 1

10

Drugs Flam.

Fila 2 128
Fila 1 121
249
035
284

1 caja de madera
D009, 4151

Alkalinos

24
37
11
72

Acidos

49

Drugs Toxicos

9
102
109
5
311
18
329

22

284

329

72

49

734

Drum #16

Protero 1/23/89.

Penulas. P.R.

Norbert Bolda, General Manager.

(809) 836-2123

Notes - (Log 5)

1) Waste which can be used.

2) Sept - Digital Equip - Food

3) ignitable waste

Date	Waste Type	WPS	Manifest #	Amount	Area.
1/19/88	D002. Hazardous waste Solid Unrecycled In the American.	P1989	88001	170#	A1
1/20/88	D004, U164 U050, U012 U031, U220	P1593	88002	22 gal.	A1
1/21/88	D002	P1909	88003	110#	A1
1/21/88	U1				

~~1/19/88~~

January

Date.	Generator	Wash Type	Storage Area
1/19/88	Universidad Inter Americana	D002	A ₁
1/20/88	"	D001, U169 U080, U012 U031, U220	A ₁
1/21/88	"	D002	A ₁
"	"	U122, U112, D001, U154	A ₁
"	"	D002 U123	A ₁
"	"	D002,	A ₁
1/25/88	"	D002	A ₁
"	"	U122 D001	A ₁
"	"	D002,	A ₁
"	"	D001	A ₁
"	"	D002	A ₁
"	"	D002	A ₁
1/26/88	ESC Agustin Antonio Samiera Rio Piedras	D002 U211	A ₁
"	"	D002	A ₁
"	"	D001 U165 U125 U802	A ₁

<u>Date</u>	<u>Generator</u>	<u>Waste TYPE</u>	<u>STORAGE AREA</u>
1/28/88	U.S. DO Agriculture Rio Piedras	D002	A ₁
"	"	D002	A ₁
"	"	D001, U154, U002 U220, U188	A ₁

FEBRUARY 1988

2/2/88	ESC Medardo Carranzo	D002, U151,	A ₁
"	"	D002,	A ₁
"	"	D001, U002 U044, U165	A ₁
2/3/88	ESC Sec. Unidad Rafael Cordero	D001	A ₁
		D002	A ₁
		D002	A ₁
2/16/88	Pepsi Cola Cidra	D001	A ₁
"	"	D002	A ₁
2/19/88	Lutron Electronic Humacao	D001, F001	A ₁

MARCH

3/3/88	ESC Dr. Jose M. Lazara ^{Carolina} Carolina	D002,	A ₁
"	"	D002	A ₁
"	"	D001	A ₁

Date	Generator Name	Waste	Area
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~~3/4/88~~

3/7/88	ESC Carmen B. Vieja	D002	A ₁
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3/16/88	Hospital Regional José N. Gandara - Ponce	D002	A ₁
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"	"	D001	A ₁
---	---	------	----------------

"	"	D002	A ₁
---	---	------	----------------

3/17/88	"	D002	A ₁
---------	---	------	----------------

"	"	D001	A ₁
---	---	------	----------------

"	"	D002	A ₁
---	---	------	----------------

3/18/88	"	D002	A ₁
---------	---	------	----------------

"	"	D001	A ₁
---	---	------	----------------

"	"	D002	A ₁
---	---	------	----------------

3/21/88	Information Magnetics Carib	D002	A ₁
---------	-----------------------------	------	----------------

"	"	D007	A ₁
---	---	------	----------------

"	"	D002, D007	A ₁
---	---	------------	----------------

"	"	F003	A ₁
---	---	------	----------------

"	"	D001	A ₁
---	---	------	----------------

April No hazardous waste

~~4/1/88~~

May

5/10/88	VSI P.R. Inc. Ponce	D008	A ₁
(hazardous waste solid, asbestos) ²			

no WAP in book

Date	Generator Name	Waste	Area
5/24/88	Escuela Superior Dr. Pila Ponce	D002	A ₁
"	"	D001	A ₁
5/25/88	Escuela Lola Rodriguez de Tio San German	D002	A ₁
"	"	D002	A ₁
"	"	D001	A ₁
5/27/88	Escuela Dr. Jose Gándora Aibonito	U144, D002	A ₁
"	"	D001	A ₁
"	"	D002	A ₁
6/1/88	Esc. Antonio R. Balcells - Culebra P.R.	D002	A ₁
		D002	A ₁
		D001	A ₁
6/3/88	Esc. Jose Celso Barbosa Aibonito, P.R.	D002	A ₁
		D002	A ₁
		D001	A ₁
6/6/88	Esc. S.U. La Plata Aibonito, P.R.	D002	A ₁
		D002	A ₁
		D001	A ₁
6/7/88	Esc. Escuela S.U. Quebrada Honda - San Lorenzo	D002	A ₁
		D002	A ₁
		D001	A ₁

-88 Sylltron Lighting Inc - Caguilla
 -88 Mennen de P.R. LTD - Juncos
 -88 Crown Cork & Seal - Carolina
 -88 Mennen de P.R. - Juncos
 -88 Esc. Juan J. Osuna - Caguas
 6/21/88
 -88 Hyatt Dorado Beach - Dorado
 -88 Escuela Superior Vocacional de Barranquitas
 6/22/88
 -88 Archchem International - Penielles
 -88 OTIS Elevator - Rio Piedras
 -88 Manuel del Valle Inc - Carolina
 -88 Alfonso Castus Martinez H.S. - Manabo
 6/27/88
 -88 Manuel Del Valle Inc - Carolina
 -88 Esc. Francisco Bueso - Santurce
 6/28/88
 -88 Academia Santa Maria - Ponce
 6/29/88
 -88 Digital Equipment - Aguadilla
 -88 Archchem International - Penielles
 -88 Pepsi Cola Mfg - Cidra

4 Dm
7 Dm
45 Dm
1 Dm
12 Dm
8500
3043
8,500
93 lbs
6 lbs
3 gal
604
153 lbs
3 gal
10 lbs
8043
8 Dm
14 Dm
400 Bag
112 lbs
5 Pt
4 Gal
13 Dm
106 lbs
2 gal
2 gal
80 lbs
1 gal
3 gal
3000 g
8043
240 Dm

Sodium chloride	N/A	
Sodium Benzoate	N/A	
citric Acid	N/A	
ERA	N/A	
Sludge	N/A	
Process water	N/A	
WTP Sludge	N/A	
Process water	N/A	
Hazardous waste Solid & liquid	U044 D002	
Flammable liquid N.O.S.	D001, U165	
Acid liquid N.O.S.	D002	
Asbestos	N/A	
Hazardous Waste Solid & liquid	U144, D002	
Acid liquid N.O.S.	D002	
Flammable liquid N.O.S.	U019 D001, U220	
Waste asbestos	N/A	
Waste oil	N/A	
Diammonium Phosphate	N/A	
ammonium Bicarbonate	N/A	
Hazardous waste Solid & liquid N.O.S.	D002	P
Flammable liquid N.O.S.	D001	P
Acid liquid N.O.S.	D002	
Diammonium Phosphate	N/A	P
Hazardous waste Sol. & liquid	D002	P
Acid liquid N.O.S.	D002	P
Flammable liquid N.O.S.	D001, U019	P
Hazardous waste Solid & liquid	D002	P
Flammable liquid N.O.S.	D001	P
Acid liquid N.O.S.	D002	P
Sludge	N/A	P
asbestos	N/A	
Potassium Benzoate	N/A	

JUNIO - 1988

Nombre y Localización del Generador	Cantidad del Desecho	Naturaleza del Desecho Nombre	Waste Type
Emilio Vizcarrondo Carolina, P.R. 6/30/88	40 lbs 1 gal 1 pt	Hazardous waste solut liq. N.O.S. Flammable liquid N.O.S. Acid liquid N.O.S.	D002 D001 D002

gabrielco Sun Oil Co	3 y ³	Sand	N/A
Antos de Aluminio Reynolds	3 y³	WTP Sludge	N/A
PREPA Aguirre	1 y³	WTP Sludge	N/A
Alberto Culver P.R. Inc - Naguabo	7500 g	Process Waste Water	N/A
PREPA Aguirre	66 y ³	WTP Sludge	N/A
SKF Labs Co. - Cidra	11 DM	Placebo	N/A
	8 DM	Triant Terene (Dyazide)	N/A
	1 DM	Lactose Monohydrate	N/A
	7 DM	Hydrochlorothiazide	N/A
	8 DM	Cimetidine (Tagamet)	N/A
	3 DM	Capsulas vacias de gel	N/A
Crown Cork & Seal, Inc - Carolina	20 y ³	WTP Sludge	N/A
PREPA Aguirre	132 y ³	WTP Sludge	N/A
Life Savers - Las Piedras	4 DM	glycerine + lico syne	N/A
PREPA Aguirre	154 y ³	WTP Sludge	N/A
Information Magnetics Parde-Moca	136 P	Corrosive Sol. No. 5.	DOOR
	1640 P	Waste Meltanol	DOOR
	1640 P	Waste Iso-Alcohol	DOOR
	320 P	1,1,1-Trichloroethylene	U206
Alberto Culver - Naguabo	9000 gls	Process waste water	N/A
PREPA Aguirre	154 y ³	WTP Sludge	N/A
Alberto Culver P.R. Inc Naguabo	8,500 g	Process Waste Water	N/A
Digitel Equipment, San Juan	5 DM	Spent oil & Grease	N/A
	4 DM	Brezer with Water And Dilt	N/A
Alberto Culver - Naguabo	8500 g	Process waste water	N/A
Mennen R.K. LTD - Juncos	37 DM	Waste Speed Stick Product	N/A
	21 DM	Waste Propylene glycol	N/A
Arbomark MFG - Caguas	8000 g	Process waste water	N/A

pieces

Julio - 1988

	Nombre y Localización del Generador	Cantidad del Desperdicio	Naturaleza del Desperdicio	Waste Type
-EE	Escuela Int. S.U. Camino Nuevo - Yabucoa 7/1/88	30 lbs 3 pts 1 lbs	Hazardous Waste Solid + liq n.o.s. Acid liquid n.o.s.	D002 D002
-EE	Escuela S.U. Limones - Yabucoa 7/1/88	49 lbs 10 lbs 1 gal	Flammable liquid n.o.s. Hazardous Waste Solid + liquid Flammable liquid n.o.s.	D001 D002 D001
-EE	Airbrook MFG Corp - Caguas	8520 g	Acid liquid n.o.s.	D002
-EE	PREPA - Aguirre	88 y ³	Process water	N/A
-EE	Union Carbide Granto - Yabucoa	11 Bag	WTP Sludge	N/A
		6.5 y ³	Waste Kevlar	N/A
	PREPA - Aguirre	154 y ³	Waste asbestos	N/A
	SKF Labs Co.	74 DM	WTP Sludge	N/A
		1 DM	Placebo	N/A
		66 DM	Capsules (Lidocaine)	N/A
-EE	Yabucoa Sun Oil Co	3 DM	Giant (Lidocaine)	N/A
	Lentes d. Armando Reynolds	35 y ³	Hazardous Waste Solids	N/A
	PREPA - Aguirre	21 y ³	Sand	N/A
EE	Alberto Culver P.R. Inc - Naguabo	14 y ³	WTP Sludge	N/A
EE	PREPA - Aguirre	7500 g	WTP Sludge	N/A
-EE	SKF Labs Co. - Cidra	66 y ³	Process waste water	N/A
		11 DM	WTP Sludge	N/A
		8 DM	Placebo	N/A
		1 DM	Triantere (Diazide)	N/A
		7 DM	Lactose Monohydrate	N/A
		8 DM	Hydrochlorothiazide	N/A
-EE	Crown Cork & Seal, Inc - Carolina	3 DM	Cimetidine (Tagamet)	N/A
-EE	PREPA, Aguirre	20 y ³	Capsulas vacias de gel	N/A
-EE	Life Savers - Las Piedras	132 y ³	WTP Sludge	N/A
EE	PREPA, Aguirre	4 DM	WTP Sludge	N/A
	Ion Magnetics Caribe - Hoca	154 y ³	glycerine + licasyne	N/A
	7/14/88	136 P	WTP Sludge	N/A
		1640 P	Corrosive Solid n.o.s.	D002
		1640 P	Waste Mottumol	F003
		250 P	Waste Iso-1 Alcohol	D001

August 88'

8/26/88 Galucos 60y³ (spent tan)
8/5/88 *Dyformilia magnolia* 2 down of next shipment

September 88'

9/1/88 Galucos 35y³ (spent tan)
9/3/88 Digital 20T (13 shipments of 7006)
9/7/88 " " (4 shipments)
9/8/88 " " (3 shipments)
9/13/88 Tolab 55 gal Door
355 gal Door
20T Door
55 gal Door
55 gal Door
9/14/88 Digital 20T 7006
9/15/88 " " "
9/20/88 VSI P.R. 66H Door

Oct. 88'

no. (L.W.) received

Nov. 88'

11/31 Digital 20T 7006
" " "

December 88'

- 12/1/88 Digital Tool (3 Shipments)
12/2/88 " " (6 Shipments)
12/20/88 Information Magnetic 1000 # Waste transfer
1001 oil.
12/28/88 Ride Construction 400 # 1000 # & V151

8/8/6

Protecto
Consent Order Summary

- o Total Number of individual requirements - 37
- o Number complied with on time - 21
- o Number complied with but late - 12
- o Number not complied with - 4

COMPLIANCE STATUS

Proteccion Technica Ecologica, Inc. ("PROTECO")

I. Violations

1. Consent Decree

- ° Reporting requirement
- ° Construct on an accelerated schedule by 7/88 the following H.W. management units:
 - stabilization facilities
 - tank storage and treatment facilities
 - container storage and storm water management facilities
- ° Surface water investigation report
- ° Remediation report

2. Non-Consent Decree

- ° Financial requirement
- ° WAP (to comply with Land Ban requirement)
- ° Land Ban requirements (storage of greater than one year and accepting wastes w/o notification)
- ° Storage of hazardous wastes on a non-designated area
- ° Exceed the storage capacity as indicated in the Part A

Financial Requirements

- o Liability - (property damage/bodily injury to third parties)
 - Sudden 1 million/2 million
 - Non-Sudden 3 million/6 million
 - insurance, financial test or corporate guarantee
- o Closure/post-closure assurance
 - Sufficient to cover cost of closure and post closure monitoring/maintenance (over 3 million)
 - Allowable mechanisms
 - trust fund
 - surety bond
 - letter of credit
 - insurance
 - financial test/corporate test
- o Recent inspection (1/89) indicate Violations of Liability and closure assurance.
- o 3007 letter to be issued 2/89 requesting financial requirement documentation.
- o If response confirms violation, then Consent Order will be modified or administrative enforcement action taken.
- o One option is to require compliance at active units now and future units as they come on-line and not at inactive units since closure at inactive units would occur incidental to new construction.

Proteco Action Items

1. Status of 3013 order compliance (1/20)
2. 1/23-24 EPA inspection findings (2/3)
3. approval letters for plans submissions (2/28)
4. revisions of Consent Decree (3/15)
 - ° injunctive relief
 - ° specific closure schedule
 - ° meet all interim status requirements in Consent Decree
 - ° removal of references to new facilities
 - ° stipulated penalties
5. chronology of communication with Proteco (2/28)
6. referral to DOJ (4/15)

PETITION FOR RELIEF

- . Extend construction schedule until 1/90
- . Postpone penalty payments until 1/90 (including 2nd payment due 1/1/89)
- . Protecto claims existing construction schedule is not a regulatory or statutory requirement
- . Petition needed due to delays in getting GDB loan approval (claims "force majeure")
- . Delays, in part, due to GDB condition that Protecto get a partner and Protecto's inability to do so
- . Construction will be completed within 12 months of financing

PROTECO

COMPLIANCE MATRIX

Paragraph # of Consent Decree	Regulation	Violation Description	Effective Date	Status
1 & 2	265.197 265.228 265.280 265.310	Closure plans/post closure plans	1/30/88	Under review
3	265.330 265.229 265.314 265.282 265.281	Disposal of hazardous waste in landfills, surface impoundments and drums buried units	12/28/87	In compliance
4	265.93	GW Quality Assessment program outline	1/30/88	Under review
5	CD	Hydrogeological Investigation (H.I.) Report	1/30/88	Approved, however Further site charac. needed
5	CD	Soil Investigation and Surface Water Investigation Report	6/30/88	Not in compliance surface water investigation not complete
6	CD	G.W. Monitoring Program and Schedule	30 days after approval of H.I. report	Not in compliance Not submitted
7	265.91 265.92	G.W. Sampling & Monitoring Plan	12/28/87	Under review

8	265.13	W.A.P.	1/30/88	Land-ban revisions required
9	265.15	Inspection Plan & Schedule	1/30/88	In compliance; approval needed
10	265.16	Training Plan	1/30/88	In compliance; approval needed
11	CD	Cease placement of hazardous waste in units	12/28/87	In compliance
12	CD	Soil Contamination report	1/30/88	In compliance
13	CD	Remediation report pursuant to Para. 5	30 days after approval of H.I. report	Not in compliance; not submitted
14	265.17 265.31 Rule I 809 Rule I 812 B (3)	Storage of hazardous waste in direct sunlight	12/28/87	Out of compliance as of 9/1/88 EQB inspections
15 & 16	265.17	"NO SMOKING" sign, precautions of ignitable or reactive waste	12/28/87	In compliance
17	CD	Repair of water storage tank	1/30/88	In compliance
18	265.32	Fire control equipment	1/30/88	In compliance; approval needed
19 & 20	265.232	Obtain decontamination equipment, provide locations in plan	1/30/88	In compliance; approval needed

21 & 22	265.32 265.34	Install and provide internal communication and alarm system	12/28/87	In compliance; approval needed
23	265.33	Maintain communication systems, fire, and decontamination equipment	12/28/87	In compliance
24	265.35	Adequate aisle space	12/28/87	In compliance
25	CD	Submit container storage area upgrade plan	1/15/88	Under review
26	265.37	Emergency arrangement	12/28/87	In compliance
27	265.51 265.52 thru .56	Contingency Plans	1/30/88	Need revision per 9/1/88 EQB Inspection
28	265.72	Manifest discrepancies	12/28/87	In compliance
29	265.73	Operating log	1/15/88	In compliance
30	265.77	Reporting requirement	12/28/87	Not in compliance
31	Rule I 812 B(1)	Maintain an adequate container system	Upon approval of upgrade plan	Upgrade plan not approved yet
32	265.171	Management of containers	After approval of mgmt. plan	Approval of plan not given
33	Rule I 812 C	Management plan to manage existing drums	1/15/88	In compliance; approval needed

34	Rule 1 812 C	Manage drums as a hazardous solid waste	12/26/87	In compliance
35	265.194	Inspection of tank	12/28/87	In compliance
36	265.222	Maintain free board	12/28/87	In compliance

- 37 Shall construct on an accelerated schedule by 7/88 the following units:
- stabilization facilities
 - tank storage & treatment facilities
 - container storage and storm water management facilities
 - not in compliance

Filename: Protec: PC015 DR 0



ESTADO LIBRE ASOCIADO DE PUERTO RICO / OFICINA DEL GOBERNADOR

February 6, 1990

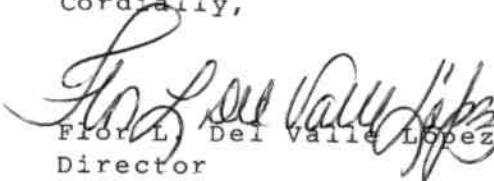
Mr. Joel Golumbek
Chief
NJ/Caribbean Office
Compliance and Enforcement
Section
US EPA Region II
26 Federal Plaza
New York, N. Y. 10278

Dear Mr. Golumbek:

The Compliance Evaluation Inspection report for
Protección Técnica Ecológica is included for your review. Your
comments will be appreciated.

If you need further assistance regarding this matter,
please contact me at (809) 767-8031.

Cordially,


Flor L. Del Valle López
Director
Land Pollution Control
Area

PMB/sec

Enclosure

February 6, 1990

MEMORANDUM

TO : Mrs. Flor L. Del Valle
Director
Land Pollution Control
Area

THROUGH : Mr. Carlos R. Martínez
Acting Director
Hazardous Waste Division

: Mr. Carmelo Vázquez
Acting Chief
Inspection, Monitoring and
Surveillance Section

FROM : Priscilla M. Bestard
Environmental Specialist

SUBJECT : Protección Técnica Ecológica
(PROTECO)
Peñuelas, Puerto Rico
PRD 091018622

The above mentioned facility was visited on December 26, 1989. During the visit a Compliance Evaluation Inspection for a TSD facility was performed.

Attached, please find the following documents in regard to this inspection:

- Inspection Report
- Inspection Checklist
- Land Ban Inspection Checklist
- Referral to EPA

A copy of this report will be submitted to EPA Region II, since this facility is under their enforcement action.

/sec

SUMMARY OF FINDINGS

Protección Técnica Ecológica (PROTECO) is a commercial TSD Facility located at Peñuelas, Puerto Rico. On December 26, 1989, the facility was visited in order to perform a Compliance Evaluation Inspection. During the visit I met with Mr. René Rodríguez, Compliance Manager of the facility.

The wastes managed at PROTECO are received from Generators in the Island of Puerto Rico. There are units to handle hazardous and non - hazardous wastes. The hazardous waste is managed in the following units: containers storage area, tank storage area, containers landfill, neutralization impoundments, oil lagoon and land treatment area. At the moment of the inspection, the only active unit was the containers storage area. All other units are inactive as a result of an agreement with EPA and EQB, for those units PROTECO will have to submit Closure Plans to comply with a Consent Decree granted by the US Department of Justice. (United States V. Proteco Inc. et. al. - Civil Action 86-1698).

The amount of 741 drums of hazardous wastes were stored at the container storage area. All the containers were labeled and segregated by waste type. Incompatibles wastes were segregated by means of an earth dike and the drums are stored over palets. An upgraded container storage area was required in EPA's Consent Decree, however at the time of the inspection, it was observed that this requirement has not been fulfilled.

In relation to the other RCRA units, it was observed that the corrosive lagoon was partially dry and comply with the two feet freeboard. The oil lagoon also complies with the freeboard. The rain water basin was completely dry and the land treatment areas were found full of weeds. The lindane tank was empty and surrounded by weeds. All of these units are inactive.

On April 28, 1989, a Notice of Deficiency was issued by the EPA, with specific Part B, Closure Plan and ground water monitoring deficiencies, for which PROTECO have to respond in an specified timeframe. Mr. Rodríguez told us that he is still working in the documents that will be submitted as a response of the NOD.

During the inspection, we found that the facility was not complying with the provisions of the Regulation for the Control of Hazardous and Non - Hazardous Solid Wastes (RCNNHSW)

and also with the 40 Code of Federal Regulations. Please see the attached list of violations.

Regarding Land Disposal Restrictions requirements (40 CFR Part 268), we found that PROTECO stores containers with Land Banned Wastes for more than one year without having any proof that the accumulation is necessary to facilitate proper recovery, treatment or disposal. This is a violation of 40 CFR 268.50.

PNB/sec

**PROTECCION TECNICA ECOLOGICA
LIST OF VIOLATIONS**

1) Rule 812 B (1) of RCNHSW states that the hazardous waste facility that stores containers of hazardous wastes must have a continuous base which is impervious to the stored waste. At the time of the inspection, the container were stored over pallets directly over the soil.

2) 40 CFR Part 265.191 requires an owner or operator of a hazardous waste facility that operates an existing tank system that does not have secondary containment system meeting the requirements of 265.193 to obtain and keep on file a written assessment reviewed and certified by an independent professional engineer that attends to the tank system's integrity by January 12, 1988.

At the time of the inspection such document was not available at the facility.

3) 40 CFR Part 265.13 requires that the facility's Waste Analysis Plan be revised to include the test required to be performed to the waste subject to Land Disposal Restrictions and the frequency of those testings.

At the time of the inspection it was found that the WAP has not been revised to include these requirements.

4) 40 CFR 268.50 requires that an owner or operator of a hazardous waste facility may store such wastes beyond one year however, the owner/operator bears the burden of proving that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment or disposal.

At the time of the inspection, PROTECO'S personnel did not have any proof or any document to comply with this requirement.

PMB/sec

February 6, 1990

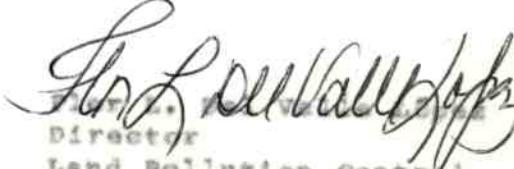
Mr. Joel Golumbek
Chief
NJ/Caribbean Office
Compliance and Enforcement
Section
US EPA Region II
26 Federal Plaza
New York, N. Y. 10278

Dear Mr. Golumbek:

The Compliance Evaluation Inspection report for
Protección Técnica Ecológica is included for your review. Your
comments will be appreciated.

If you need further assistance regarding this matter,
please contact me at (809) 767-8031.

Cordially,


Robert L. DeVito
Director
Land Pollution Control
Area

PMB/sec

**HAZARDOUS WASTE CHECKLIST
HAZARDOUS WASTE FACILITY STANDARDS**

Copy of Report sent to: _____ Facility ✓ EPA Region II

Facility Name: Protección Técnica Ecología, Inc.

Local Address: Road 385 Km 3 Tallaboa Ward, Pinar del Rio

Postal Address Firm Delivery

Ponce Zip Code 00731

Telephone Number 836 - 2058

E.P.A. ID # PRD 091018622

Date of Inspection: December 26, 1989

Time In: _____ Time Out: _____

Photos Taken: / / YES /X/ NO

If yes, how many? _____

Samples Taken: / / YES /X/ NO No. of Samples _____

Participating Personnel

E.Q.B. or E.P.A. Personnel: Priscilla M. Bestard
Mayra Fortes

Facility Personnel: René Rodríguez
Compliance Manager

Report Prepared by: (Name) Priscilla M. Bestard

Agency: EQB

Telephone Number: (809) 767-8031

Approved for the Director by: _____

/sec

Handwritten notes:
 1) The generators
 submit to a chemical analysis
 and COTELCO's personnel
 make some physical analysis
 to verify the load.

265.13 (a)/ 807 I - Waste Analysis

YES NO N/A

1) Company maintains a detailed chemical and physical analysis of a representative sample of the waste or each waste.

✓

265.13(b)/ 807 I (5) Waste Analysis Plan

1) Company maintains a written Waste Analysis Plan (WAP) at the facility.

✓

2) WAP contains the following:

a) Proper parameters
Specify: _____

✓

b) Proper test methods
Specify: _____

✓

c) Proper sampling methods
Specify: _____

✓

d) Review or Repeat analysis
Frequency: _____

✓

265.13 (b)(5)/ 807 I 6 For off-site facilities

1) Does the hazardous waste come to this facility from an outside source?. If yes, list the name(s) of generators.

✓

There is a big list of generators served by
PRUTEC it includes also a lot of
small quantity generators.

- | | YES | NO | N/A |
|---|-------------------------------------|--------------------------|--------------------------|
| 2) The WAP contain the waste analysis that hazardous waste generators have agreed to supply. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3) Are there procedures in the WAP to insure that waste received conforms to the accompanying manifest? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4) WAP describes procedures used to determine the identity of each shipment. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5) Sampling method used to obtain representative sample of the waste to be identified. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Comments: The WAP complies with the requirements of this section.

265.14/ 803D Security

- | | | | |
|--|-------------------------------------|--------------------------|--------------------------|
| 1) The facility has: | | | |
| a) 24 hour surveillance system | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) artificial or natural barrier | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Signs with the legend "Danger - Unauthorized Personnel Keep Out" and "Peligro - Prohibido el paso de personal no autorizado" posted at each entrance to the facility. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Sign at main entrance of facility | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Comments:

Company complies with this section

265.15(a)/ 803-P General Inspection Requirements

	YES	NO	N/A
1) Has the owner or operator developed and follow a written schedule of inspections?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) monitoring equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) safety equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) emergency equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) security devices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) operations and struct equip.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Written inspection schedule (Plan) is kept at the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) The schedule identifies:			
a) types of problems to be looked for during the inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) frequency of inspection:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Does the owner/operator record inspections in a log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5) Records are kept for at least three (3) years from the date of inspection.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6) Inspection log includes:			
a) date of inspection	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) time	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) name of the inspector	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) observations made	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	YES	NO	N/A
e) date and nature of remedial actions	<u>✓</u>	<u>—</u>	<u>—</u>
Comments: _____			

265.16/R 808 - Personnel Training Records

1) Facility personnel have successfully completed a program of training since six months after the date of their employment:	<u>✓</u>	<u>—</u>	<u>—</u>
2) Program directed by a person trained in hazardous waste management procedures.	<u>✓</u>	<u>—</u>	<u>—</u>
3) Records of Training:			
a) Job title for each position	<u>✓</u>	<u>—</u>	<u>—</u>
b) Name of employee filling each job	<u>✓</u>	<u>—</u>	<u>—</u>
c) Job descriptions for each position	<u>✓</u>	<u>—</u>	<u>—</u>
d) Description of the type and amount of both introductory and continuing training	<u>✓</u>	<u>—</u>	<u>—</u>
4) Program designed to ensure that personnel are able to respond to emergencies	<u>✓</u>	<u>—</u>	<u>—</u>
5) Training records on all current employees are kept until closure and for former employees are kept for at least three (3) years.	<u>✓</u>	<u>—</u>	<u>—</u>
6) Annual review	<u>✓</u>	<u>—</u>	<u>—</u>

COMMENTS: Training records comply with the req's
of this section.

265.17/Rule 809 General Requirements for Ignitable, Reactive or Incompatible Wastes

	YES	NO	N/A
1) HW handled at the facility are ignitable incompatible, and reactive	<u>✓</u>	<u> </u>	<u> </u>
2) "No Smoking" signs are placed conspicuously:	<u>✓</u>	<u> </u>	<u> </u>
3) Separation from sources of ignition or reaction is provided (Regs. state more than 50 feet)	<u>✓</u>	<u> </u>	<u> </u>
4) Confinement of smoking and open flame to specially designated locations is established. (Check "No Smoking Signs")	<u>✓</u>	<u> </u>	<u> </u>
5) Management to avoid production of vapors, heats, pressure, etc.	<u>✓</u>	<u> </u>	<u> </u>

Comments: _____

Subpart C - 265.30/R 810 - Preparedness and Prevention**1) Required Equipment:**

a) Internal comm/alarm system	<u>✓</u>	<u> </u>	<u> </u>
b) Telephone/2 way radio	<u>✓</u>	<u> </u>	<u> </u>
c) Portable Fire Control Equipment	<u>✓</u>	<u> </u>	<u> </u>
d) Adequate Water/Pressure (Fire Control)	<u> </u>	<u> </u>	<u> </u>

	YES	NO	N/A
e) Spill Control and decontamination equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Equipment Test Result	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3) Access to comm/alarm system:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4) Adequate Aisle Space	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
* 5) Local Authorities Arrangements (Evidence)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

COMMENTS:

Arrangements with local authorities have not been updated since 1987. A meeting will be held at PROTECO to review the Contingency Plan.

Subpart D 265.50/R 207-Contingency Plan (CP) and Emergency Procedures

1) Plan keep on site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Content of Plan:			
a) Description of actions the fac. personnel shall take in response to emergencies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Local Authority Arrangements	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) List names, addresses, and phone numbers of all persons qualified to act as emergency coordinator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) List of emergency equipment, including location and physical description	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Evacuation Plan (signals to be used to begin evacuation, evacuation routes or alternative)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	YES	NO	N/A
3. CP has been submitted to local authorities	<u>✓</u>	<u> </u>	<u> </u>
4. CP has been amended	<u>✓</u>	<u> </u>	<u> </u>

COMMENTS:

Contingency Plan was found acceptable.

Subpart E - 265.71/504 D (1) - Manifest system Operation (for off-site facilities only)

1) Operator sign, date, and retain copy of each manifest that accompanies each shipment onto the site	<u>✓</u>	<u> </u>	<u> </u>
2) Has the operator found discrepancies in manifest and waste loads?	<u>✓</u>	<u> </u>	<u> </u>
3) Appropriate actions were taken by the off-site facility to reconcile the discrepancy with the waste generator or transporter	<u>✓</u>	<u> </u>	<u> </u>
4) The operator accept wastes at the facility that were not accompanied by a manifest.	<u> </u>	<u>✓</u>	<u> </u>
5) Appropriate actions were taken by the operator to obtain information on the generator who sent the waste and to provide documents to the regulatory agency.	<u>✓</u>	<u> </u>	<u> </u>

Comments:

Company complies with this section.

265.73/ 502 C Operating Record

	YES	NO	N/A
1) The operator maintain a written operating record at the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) This record includes:			
a) description of the waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) quantity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) method of treatment, storage or disposal	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) date of treatment, storage or disposal	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) location of the waste	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) final disposition of all wastes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) records and results of waste analysis	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) records and results of inspections	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) closure cost estimates and post closure cost (if apply)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments:

They are included in the closure plans.

Operating record was found acceptable.

262.20/703 - Manifest Requirements

1) Describe the approximate size of an average shipment made on a monthly basis:

2) Check the most recent manifest, for:

	YES	NO	N/A
a) Generator's ID number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Document Number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Generator's address and phone number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Transporter's name and ID number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Date of shipment and signature	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Waste shipping	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Waste hazard class (DOT)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Waste quantity or volume	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Waste No. EPA	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Type and number of containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k) Designated TSD facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l) Handling code for wastes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3) Check Emergency Information on Manifests:

a) Immediate response information	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Special handling instructions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emergency contact (phone number)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

4) Check for Certification Statement: Signed

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
-------------------------------------	--------------------------	--------------------------

5) Check if exception reports have been submitted to the EPA and EQB covering any shipment made more than thirty days ago

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Comments:

Manifest submitted by generators and by PROTECO
comply with this requirements.

265.74/ 505 B, C, D Availability, Retention and Disposition of Records

YES NO N/A

1) All records, including plans are available at all reasonable times for inspection.

☒ ☐ ☐

Comments:

There was no problem to inspect the records.

265.75/503 A Biennial Report

1) Has the owner/operator submitted the biennial report by March 1 of each even numbered year?

☒ ☐ ☐

Subpart F - 265.90/ R 804 Groundwater Monitoring

1) The owner/operator has a groundwater monitoring plan capable of determining the facility's impact on the quality of the ground water.

☒ ☐ ☐

2) There are 7 monitoring wells installed at the facility.

☐ ☐ ☐

3) The depth to groundwater is _____

☐ ☐ ☐

4) The depth of the monitoring wells is _____

☐ ☐ ☐

Note: GWM report will be prepared during future visit.

YES NO N/A

5) Groundwater monitoring system is capable of yielding groundwater samples for analysis.

See the note on the previous page

6) Monitoring wells are installed hydraulically upgradient. Specify how many and the depth of each.

1 well - 22-W-85 ~ 79'

7) Monitoring wells are installed hydraulically down gradient. Specify how many and the depth of each

6 wells - 18-W-85 = 59.5'

23-W-85 ~ 55'

26-W-85 ~ 71'

28-W-85 ~ 98'

29-W-85 ~ 45'

30-W-85 ~ 55'

8) Owner/operator has a groundwater sampling and analysis plan.

9) The plan include procedures and techniques for:

- a) sample collection
- b) sample preservation and shipment
- c) analytical procedures
- d) chain of custody

10) The owner/operator has prepared an outline of a groundwater quality assessment program.

Comments:

Subpart G - 265.112/ 805 A - Closure Plan

	YES	NO	N/A
1) Facility has a written closure plan and keep a copy and its revisions at the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) This plan include:			
a) description of how and when the facility will be partially closed (if applicable) and ultimately closed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) maximum extent of the operation which will be unclosed during the life of the facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) an estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) a description of the steps needed to decontaminate facility equipment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) a schedule for final closure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) final disposition of all wastes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments: Last revision was May 1, 1988. Company is working in a new revision.

265.118/ 805 B - Post Closure Plan

1) Facility has a written post-closure plan kept at the facility	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------	--------------------------

	YES	NO	N/A
2) This plan include and identifies:			
a) Activities which will be carried on after closure and frequency of these activities.	—	—	—
b) A description of the planned ground-water monitoring activities	—	—	—
c) The integrity of the cap and final cover or other containment structures where applicable.	—	—	—
d) Describe the function of the facility monitoring equipment	—	—	—
e) The name, address and phone number of a person or office to contact about the disposal facility during the post-closure period.	—	—	—
f) Written estimate of the cost of post-closure of the facility. If yes, what is it?	—	—	—

Subpart H - 265.140/R 808 - Financial Requirements

1) Does the owner/operator has submitted the documentation required in this section to EQB and/or EPA for evaluation. — ☒ —

Subpart I - 265.170 - 265.177/R 812 - Containers

1) Type of Containers used:

55 gallons-metal and plastic drums

2) Condition of Containers

	YES	NO	N/A
a) Leaks	—	✓	—
b) Ruptures	—	✓	—
c) Corrosion	—	✓	—
d) Closed (Except on Use)	✓	—	—
e) Impermeable Base	—	✓	—
f) Secondary Containment	✓	—	—
g) Evident Spills	—	✓	—
h) Heat Pressure	—	✓	—
i) 50 ft. Buffer Zone (Ignitable or Reactive Waste Only)	✓	—	—
j) Incompatible Material Segregated in different containers, not placed in unwashed container, artificial barrier)	✓	—	—
k) Labels visible for easy identification	✓	—	—
3) Storage Area Inspected Weekly	✓	—	—

Comments:

Subpart J - 265.190 - 265.199/R 813 - Tanks

1) Number and size of tanks containing hazardous waste:

Lindane tank was empty.

2) Identify the waste treated/stored in each tank:

There is only one tank. It was used to store
lindane.

3) Operating Requirements	YES	NO	N/A
a) Leaks	—	✓	—
b) Ruptures	—	✓	—
c) Corrosion	—	—	—
d) sufficient free board (for uncovered tanks)	—	—	✓
e) Spill prevention controls (check valves dry discount couplings)	—	✓	—
f) Overfill prevention control (level sensing devices, automatic feed cut off, etc.)	—	✓	—
4) Waste Analysis/Trial Test Records (whenever tank is used to treat or store HW different from previous waste)	—	—	✓
5) Tank Inspections-Check logs for:			
a) Overfill/spill control equipment (waste feed cut-off, by-pass, etc.) at least once each operating day	✓	—	—
b) Monitoring and Leak Detection Equipment Data (e.g. pressure, temperature) at least once each operating day	—	✓	—
c) Cathodic protection systems, if present	—	✓	—

	YES	NO	N/A
d) Construction Materials of tank, and surrounding portion to detect erosion or signs of release, at least once each operation day	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Above ground portions of ground systems to detect corrosion or release at least once each operating day	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Level of waste, at least once each operating day	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Records of inspection maintained	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6) Ignitable or reactive waste are stored in such manner which protects them from a source of ignition or reaction	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Maintenance of protective distances, according to National Fire Protection Association	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7) Incompatible Wastes are being stored separate from each other.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8) Tank used to store or treat hazardous waste with no free liquids	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9) Tank inside a building with impermeable floor	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10) Written assessment that attests to the tank system integrity (if secondary system does not meet appropriate requirements)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11) Tank used to store or treat F020, F021 F022, F023, F026, and F027	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
12) Tank systems age _____			
13) Facility age _____			
14) Secondary containment system requirements:			

	YES	NO	N/A
a) Constructed of or lined with material compatible with waste	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Sufficient strength and thickness	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Placed on a foundation or base capable of providing support	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Provided with a leak detection system which detects problems within 24 hours	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Sloped or designed to drain and remove spilled material, etc.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
15) Secondary containment systems include:			
a) liner (external to the tank)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) vault	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) double-walled tank	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) equivalent device; describe	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

16) Liner and vault designed to contain 100% of the capacity of the largest tank	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
17) Liner and vault designed to prevent run-on or infiltration of precipitation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
18) External liner free of cracks or gaps	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
19) Vault constructed with chemical resistant water stops in place at all joints	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
20) Vault provided with an interior impermeable coating or lining	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	YES	NO	N/A
21) Double-walled tank protected from corrosion	—	<input checked="" type="checkbox"/>	—
22) Ancillary equipment visually inspected for leaks on a daily basis	—	<input checked="" type="checkbox"/>	—
23) Has the owner or operator obtain a variance from EPA	—	<input checked="" type="checkbox"/>	—

Facility Name: PROTECO
ID Number: _____
Inspector: Priscilla Bestard
Date: Dec 26, 1989

DRAFT
RCRA LAND RESTRICTION
TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

I. FACILITY IDENTIFICATION

A. Facility Name: Proteccion Tecnica Ecologica B. Street (or other identifier): Road 385, Km 4, Tallaboa
C. City: Peñuelas D. State: PR E. Zip Code: 00 F. County Name: _____

G. Nature of business; identification of industrial and waste management operations; relevant SIC codes

H. EPA ID #: PRD 091018622

I. Facility Contact (Name and Phone Number): Mr. René Rodriguez 836-2058

II.A. For onsite facilities, complete the generator checklist

Comments

B. General Facility Standards

1. General

- a. Does the facility conduct waste analysis (total and TCLP) on-site or through a commercial laboratory?
through commercial lab and makes fingerprint tests to incoming loads.
- b. Describe the frequency of sampling conducted by the facility.
10% of drums for each specific waste in each shipment. Tanker trucks or railcars every shipment received.

2. Treatment Facilities

- a. Has the treatment facility revised its waste analysis plan [§268.7(b)] to meet the requirements of §264.13 or §265.13? Yes No*
- (i) Is the treatment facility conducting TCLP tests for wastes specified in Appendix A (i.e., those prohibited wastes subject to treatment standards expressed as waste extracts) per 286.7(b)(i)? Yes No*

* A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

4. Does the handler generate any of the following F004 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid
nitrobenzene

Yes ☒ No ☐
Yes ☐ No ☒

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene
methyl ethyl ketone
carbon disulfide
isobutanol
pyridine

Yes ☒ No ☐
Yes ☒ No ☐
Yes ☐ No ☒
Yes ☐ No ☒
Yes ☒ No ☐

6. Are any of the constituents listed in the questions 1-5 used for their "solvent" properties -- that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers?

☒ Yes ☐ No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

☒ Yes ☐ No

If the answer is yes, list the constituents.

(c) Diluents?

☒ Yes ☐ No

If the answer is yes, list the constituents.

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

c. Do operating records track the location, quantity and dates that wastes exceeding treatment standards entered and were removed from storage [§264.73 or §265.73]? ☒ Yes ☐ No*

d. Do operating records agree with container labeling? [§268.50(a)(2) or §264.73 or §265.73] ☒ Yes ☐ No*

e. Is waste exceeding treatment standards stored for less than 1 year? ☒ Yes ☐ No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery, treatment, or disposal? ☐ Yes ☐ No

If yes, state how: _____

f. Was/is waste exceeding treatment standards stored for more than one year? ☒ Yes ☐ No

If yes, state the owner/operator's proof that such storage was solely for the purposes of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

no proof was provided

D. Treatment in Surface Impoundments (§268.4)

1. Are prohibited wastes placed in surface impoundments for treatment? ☐ Yes ☒ No

If no, go to E.

2. Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both [§268.4(b) and §268.3]? ☐ Yes* ☐ No

3. Did the facility submit a certification of compliance with minimum technology and ground water monitoring requirements, and the waste analysis plan to the Agency [§268.4(a)(4)]? ☐ Yes ☐ No*

4. Have the minimum technology requirements been met [§268.4(a)(3)]? ☐ Yes ☐ No*

a. If the minimum technology requirements have not been met, has a waiver been granted for that unit(s) [§268.4(a)(3)(iii)]? ☐ Yes ☐ No*

PROTECO's surface impoundments were inactive before San Ban Reg's became in effect.

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

5. Have the Subpart F ground-water monitoring requirements been met [§268.4(a)(3)]? ☐ Yes ☐ No*
6. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan and are the results in the operating record for all wastes with treatment standards or prohibition levels [§268.4(a)(2)]? ☐ Yes ☐ No*
7. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards or prohibition levels? ☐ Yes ☐ No
8. Provide the frequency of analyses conducted on treatment residues: _____

Does the frequency meet the requirements of the waste analysis plan [§264.13 or §265.13]? ☐ Yes ☐ No*
9. Does the operating record adequately document the results of waste analyses performed [§264.13 or §265.13]? ☐ Yes ☐ No*
10. Have the hazardous waste residues that exceed the treatment standards and/or prohibition levels been removed adequately and on an annual basis [§268.4(a)(2)(ii)]? ☐ Yes ☐ No*
- a. If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? (note: sludge exceeding treatment standards must be removed) ☐ Yes ☐ No
11. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? ☐ Yes ☐ No
12. When removed, were residues of restricted wastes managed subsequently in another surface impoundment? ☐ Yes ☐ No
- a. Were these residues subject to a valid 268.8 certification? ☐ Yes ☐ No*
13. When removed, were wastes treated prior to disposal? ☐ Yes ☐ No
- a. If yes, are waste residues treated on or offsite?

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

b. Identify management method _____

E. Treatment

1. Does the facility operate treatment units (regulated or exempt) (not including surface impoundments)?
____ Yes ☒ No

If no, go to "F."

2. Describe the treatment processes, including exempt processes.

3. Does the facility treat soft hammered wastes?
____ Yes ____ No

a. If yes, is treatment occurring as described in the generator's certification/demonstration [§268.8(c)(1)]?
____ Yes ____ No*

b. Did the treatment facility certify he treated the soft hammered waste as per the generator's demonstration and maintain copies of all certifications [268.8(c)(1)]?
____ Yes ____ No*

c. Did the treatment facility send a copy of the generator's demonstration and certification to the receiving treatment, recovery, or storage facility [§268.8(c)(2)]?
____ Yes ____ No*

4. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the restricted wastes are less than treatment standards or prohibition levels [§268.7(c)(2)]?
____ Yes ____ No*

5. Describe frequency of testing of treatment residuals.

6. Was dilution used as a substitute for treatment [§268.3]?
____ Yes* ____ No

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

7. Are all notifications, certifications, and results of waste analyses kept in the operating record [§264.73(b) or §265.73(b)]? ☐ Yes ☐ No*

8. Are notices provided to land disposal facilities complete with Waste Number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment standard stating that waste has been treated to treatment performance standards [§268.7(b)(4) and (5) and §268.8(c)(1)]? ☐ Yes ☐ No*

9. If the waste or treatment residue will be further managed at another storage or treatment facility, has the treatment facility complied with the 268.7(a) notification and certification requirements applicable to generators [§268.7(b)(6)]? ☐ Yes ☐ No*

F. Land Disposal

1. Are restricted and/or prohibited wastes placed in land disposal units (landfills, surface impoundments** waste piles, wells, land treatment units, salt domes/beds, mines/caves concrete vault or bunker?) ☐ Yes ☒ No

2. Did facility have the notice and certification from generators/treaters in its operating record that all prohibited wastes disposed met standards for generation or treatment [§268.7(c)(1); 268.7(a),(b)]? ☐ Yes ☐ No*

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)(2)] ☐ Yes ☐ No*

If yes, was the frequency of testing as required by the facility's waste analysis plan [§264.13 or §265.13]? ☐ Yes ☐ No*

4. Were prohibited wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units [268.30] excluding national capacity variances [268.30(a)]? ☐ Yes ☐ No

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case or capacity extension [268.5] or treatment standard variance [268.44][§268.30(d), §268.31(d), §268.32(g), §268.33(e)]? ☐ Yes ☐ No*

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

5. Were restricted wastes subject to a national capacity variance or case-by-case extension disposed? _____ Yes _____ No

If yes, have the minimum technology requirements been met for all units receiving such wastes [§268.30(c), §268.31(c), §268.32(d), §268.33(d)]? _____ Yes _____ No*

6. Were adequate records of disposal maintained [§264.73(b) or §265.73(b)]? _____ Yes _____ No*

7. If wastes subject to a nationwide variance, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have generator's notices [268.7(a)(3)] and records of disposal? [§264.73(b) or §265.73(b)] _____ Yes _____ No*

8. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? _____ Yes _____ No

9. If the owner/operator is disposing of a soft-hammer waste, is he maintaining the generators and treaters (if applicable) notices and certifications [§268.8(a)(2)-(a)(4)]? _____ Yes _____ No*

- a. Is the facility disposing of any soft hammer wastes that may be classified as California wastes? _____ Yes _____ No

- b. Did the facility seek to verify whether these wastes may be subject to all restrictions, e.g., California ban? _____ Yes _____ No

APPENDIX A-1

SOLVENT IDENTIFICATION CHECKLIST

Handler Name: _____
 ID Number: _____
 Inspector: _____
 Date: _____

Comments

APPENDIX A-1

SOLVENT IDENTIFICATION CHECKLIST

*Note: These wastes
are not generated
by PROTECO, only
by its clients.*

1. Does the handler generate any of the following F001 constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
carbon tetrachloride	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
chlorinated fluorocarbons	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

2. Does the handler generate any of the following F002 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichloroethylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methylene chloride	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,1-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
chlorobenzene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
trichlorofluoromethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloro-1,2,2-trifluoroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ortho-dichlorobenzene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1,1,2-trichloroethane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
acetone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl acetate	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
ethyl ether	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methyl isobutyl ketone	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
n-butyl alcohol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
cyclohexane	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
methanol	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

If the F003 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

☐ Yes ☒ No

Facility Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

- (ii) Is the treatment facility using the paint filter test for the California waste residues [§268.7(b)(11)]? ☐ Yes ☒ No
- (iii) Is the treatment facility testing the pH of California waste residues? ☐ Yes ☒ No *n/a*
- (iv) Is the treatment facility testing concentrations (not extracts) in the waste residues for prohibited wastes with established treatment standards expressed as waste concentrations [§268.7(b)(3)]? ☐ Yes ☒ No*
- (v) Is the treatment facility testing extracts of the waste residues for prohibited wastes having established treatment standards expressed as extract concentrations [§268.7(b)(1)]? ☐ Yes ☒ No*

3. Land Disposal Facilities

- a. Has the facility retained all notices and certifications from generators, storage and treatment facilities [268.7(c)(1)]? ☐ Yes ☒ No*
- b. Are wastes and waste residues tested for compliance with applicable treatment standards and prohibitions [§268.7(c)(2)]? ☐ Yes ☒ No*
- c. Are they being tested in conformance with the frequency specified in the waste analysis plan [§268.7(c)(3)]? ☐ Yes ☒ No*
- d. Are the appropriate tests (TCLP vs. total waste) being used [§268.7(c)(2)]? ☐ Yes ☒ No*

At present PRT LLC's land treatment unit is inactive.

C. Storage (§268.50)

1. a. Are restricted wastes exceeding treatment standards stored (excepting wastes subject to no migration exemptions, nationwide variances, case by case extensions, soft-hammered wastes)? ☒ Yes ☐ No

If no, go to "c."

- b. Are all containers clearly marked to identify content and date(s) entering storage [§268.50(a)(2)]? ☒ Yes ☐ No*

* A potential violation is indicated

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

(d) Extractants? ☒ Yes ☐ No

If the answer is yes, list the constituents.

(e) Fabric scouring? ☐ Yes ☒ No

If the answer is yes, list the constituents.

(f) Reaction and synthesis media? ☐ Yes ☒ No

If the answer is yes, list the constituents.

If questions 1-6 led the inspector to believe that the waste may be an F-solvent, answer question 7.

7. Are any of the above constituents spent solvents? A solvent is considered "spent" when it has been used and is no longer used without being regenerated, reclaimed, or otherwise reprocessed. ☒ Yes ☐ No

8. If the waste is a mixture of constituents as determined in questions 1-6, answer this to determine whether it is a "solvent mixture" covered by the listings.

If the wastestream is mixed and contains more than one of the F001-F005 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5% methylene chloride
2% trichloroethylene
25% 1,1,1-trichloroethane
68% mineral spirits
100%

If the wastestream is a mixture containing a total of 10% or more by volume) of one or more of the F001, F002, F004, or F005 listed constituents before use, it is a listed waste.

Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

With respect to the F003 solvent wastes, if, before use, the wastestream is mixed and contains only F003 constituents, it is a listed waste. For example:

33% acetone
16% methanol
51% ethyl ether
100%

If in light of the above, the handler appears to be generating F001-F005 hazardous wastes, refer this facility to the enforcement official for follow-up actions verifying the use of solvents at the facility.

The following violations were found at Proteco.

✓ 40 CFR 270.71, 40 CFR 270.72, RCHNHSW Rule 915 and Rule 916C.
(I.S. requirements)

During the period of 9/88 - 1/89, Proteco accepted 32 trailer trucks of contaminated soil with F006 weight approx. 640 tons (manifests attached exhibit #1). At the time of the inspection, all except one trailer were shipped out. Out of 32 trailer trucks, 28 stored greater than 10 days (21 did not have Chem. Waste Mgmt. manifest) and the remaining four shipped out within 10 days. As indicated by the EQB inspection of 9/1 - 2/88 (report attached, exhibit #2) 9 trailers were stored in a non-designated storage area. Based on the updated Part A application (exhibit #3), Proteco is permitted to store up to 1,000 drums at the storage area. With the contaminated soil from Digital and approx. 734 drums of other hazardous waste, Proteco has far exceeded the storage capacity permitted under the Part A application. Therefore, Proteco is in violations of 270.71, 270.72, Rule 915 and Rule 916C requirements.

40 CFR 265.13 (Waste Analysis)

- o On 8/5/88 and 12/20/88, Proteco accepted drums of transformer oil from Information Magnetic without testing for PCB (manifests # 8803 and 3.88, WPS pl769)
- o On 12/28/88 Proteco accepted hazardous waste generated by Rido Construction without determining whether it matches the identity of the waste specified on the accompanying manifest or shipping paper.
- o None of the solvents or other restricted waste accepted by Proteco was tested per 265.13 and 268.7 requirements.

Based on our findings, the procedures used to inspect and analyze each shipment of hazardous waste do not ensure that the waste matches the identity of the waste designated on the accompanying manifest. The instituted procedures only indicate testings of characteristic of ignitability and corrosivity (pH). Proteco is, therefore, in violation of the 265.13(a) requirements in that it does not determine the identity of manifested listed waste or manifested EP - toxic waste.

265.16 (Personnel training)

At the time of the inspection, Mr. Rene R. Rodriguez, Compliance Manager, indicated that he will be attending seminars/courses in March or April in DOT requirements and RCRA related courses. It is clearly stated in 40 CFR 265.16(a)(2) that a training program must be directed by a person trained in hazardous waste management procedures. Mr. Rodriguez did not have any previous required training (he could not identify any relevant courses taken) and, therefore, does not meet this requirement.

✓ 40 CFR 265.50 (Contingency Plan)

The contingency plan must be amended to include the new emergency coordinator. This was not done.

✓ 40 CFR 265.177(c) (Incompatible Waste)

One drum of oxidizing material was found in a storage bay containing F001 and F002 waste. There was no dike or berm to segregate the drums in the event of a leak. As per 40 CFR Part 265, Appendix V - Examples of Potentially Incompatible Waste, strong oxidizers must be segregated from solvents. This practice or procedure of storage of incompatible waste is an unacceptable management procedure and, therefore, is in violation of 40 CFR 265.177. The drum was generated from Saint John School, 1454-66 Ashford Ave, dated 9/7/86, and was labeled D002 and stated oxidizing material.

✓ 40 CFR 265.77 (reporting)

Sampling data indicated there is a release from the oil lagoon into the groundwater. Proteco failed to report such release to the regulatory agencies. This also is required under the Consent Decree.

✓ 40 CFR 268.7 (Waste Analysis)

Proteco needs to revise its Waste Analysis Plan to include the testing methods under 40 CFR 268.7.

40 CFR 286.7(c) (Notification)

Proteco accepted restricted waste subject to land disposal restrictions rule without meeting the notification requirements.

✓ 40 CFR 265.73 (Operating Record)

53 Fed. Reg. 31211 (August 17, 1988), clearly stated that for an off-site storage facility, a copy of the notice, and the certification and demonstration if applicable, required by the generator or the owner of operator under 268.7 or 268.8 be kept on file. At the time of the inspection, Proteco failed to retain all the manifests and notification/certification required by Digital under 40 CFR 268.

40 CFR 268.50 (Prohibitions on Storage)

Since Nov. 7, 1986, Proteco has been accepting hazardous wastes subject to land disposal restriction rule. At the time of the inspection, Proteco stored restricted waste for greater than one year. Storage for greater than one year is allowed if the storage is needed to ensure proper treatment recovery or disposal. Such treatment, recovery or disposal is not available

at Proteco. Therefore, storage for greater than one year is not necessary. Proteco is in violation of 40 CFR 268.50(c). (see exhibit #6, hazardous waste inventory)

40 CFR 265 Subpart H (Financial Requirements)

Liability Requirements

Proteco indicated in its Part B permit application an insurance policy issued by Natural Insurance Co. effective thru 4/6/86 for a liability coverage of \$1 million. At the time of the inspection, Proteco provided a copy of the certificate of insurance (exhibit #4). As of 2/7/89 (see attached letter, exhibit #5), Proteco was still seeking the necessary insurance to cover nonsudden accidental occurrence. A copy of a second Certificate of Insurance was also provided on 2/7/89 for apparently the same policy as the certificate in exhibit 4. On April 16, 1982, EPA promulgated regulations requiring owners or operators to demonstrate liability coverage during the operating life of the facility for bodily injury and/or property damages to third parties resulting from accidental occurrences arising from facility operations. Under 40 CFR 265.147, an owner or operator of a hazardous waste treatment, storage, or disposal facility must demonstrate, on a per-firm basis, liability coverage for sudden accidental occurrences in the amount of \$1 million per occurrence and \$2 million annual aggregate, exclusive of legal defense costs. Certificate of Insurance, dated 1/31/89, indicated the comprehensive general liability coverage for bodily injury and property damage is \$1 million each occurrence and \$1 million aggregate. Furthermore, the Certificate of Insurance submitted by Arieta & Combas Insurance Agency, Inc. does not meet the requirements of 265.147(a)(1)(i). Therefore, based on the above, Proteco is not meeting the requirements of 40 CFR 265.147(a) and (b).

Financial Assurance

With respect to closure cost estimates at existing units, Proteco has submitted estimates of closure costs of \$3 million. Based on our review, the closure estimate should be approximately \$24 million. Proteco should revise costs more in line with EPA's estimate. If Proteco has established an Irrevocable Letter of Credit and Standby Trust Fund Agreement for the closure of all existing facilities in an amount of \$3 million, it would be inadequate. Therefore, Proteco is in violations of 40 CFR 265.143 requirement.

Violations of the Consent Decree

Proteco fails to meet the following conditions of the Consent Decree:

- 1) Reporting requirement (as mentioned above)

2) Construct in an accelerated schedule by 7/88 the following hazardous waste management units.

Stabilization Facilities

Tank Storage and Treatment Facilities

Container Storage and Storm Water Management Facilities

3) Surface water investigation report has not yet been submitted.

Recommendation

Following recommendation:

- o issue enforcement action against Proteco
- o require Proteco to submit a copy of the insurance policy and to clarify as to whether the policy covers liability resulting from sudden accidental occurrence arising from operations at Proteco, including Hazardous Waste operations.

SHIPMENTS OF F006 RECEIVED BY PROTECO

During the period of 8/88 - 1/89, Proteco accepted 33 trailer trucks of contaminated soil with F006 weight approx. 660 tons (manifests attached). The shipments (each weight approx. 20 tons) are as follows:

<u>Manifest #</u>	<u>Date Received</u>	<u>Date Shipped Off Site</u>
88244	09/03/88	09/15/88
88245	09/03/88	09/21/88
88246	09/03/88	09/15/88
88247	09/03/88	09/15/88
88248	09/03/88	09/19/88
88249	09/03/88	09/21/88
88250	09/03/88	09/27/88
88251	09/03/88	09/21/88
88252	09/03/88	09/27/88
88253	09/03/88	10/14/88
88254	09/03/88	09/27/88
88255	09/03/88	10/06/88
88256	09/03/88	10/24/88
88257	09/03/88	09/28/88
88258	09/03/88	09/06/88
88259	09/07/88	10/06/88
88260	08/07/88	10/07/88
88261	09/04/88	10/24/88
88262	09/08/88	10/15/88
88263	09/08/88	10/17/88
88264	09/08/88	10/14/88
88265	09/19/88	10/24/88
88266	11/30/88	-
88267	11/29/88	01/20/89
88268	12/01/88	01/11/89
88269	12/01/88	01/12/89
88270	12/01/88	01/12/89
88271	12/02/88	12/13/88
88272	12/02/88	12/13/88
88273	12/02/88	12/13/88
88274	12/02/88	01/20/89
88275	12/02/88	01/12/89
88276	12/02/88	01/20/89

